

To: Elizabeth Franklin (USACE)

From: AmyMarie Accardi-Dey (WSP)

Len Warner (WSP)

Date: January 13, 2021

RE: 2008 Oversight of the CPG Sediment Coring Program

The purpose of this memorandum is to transmit documentation summarizing government field oversight of the 2008 Sediment Coring Program conducted by the Cooperating Parties Group (CPG) on the Lower Passaic River for the Remedial Investigation / Feasibility Study (RI/FS) of Operable Unit (OU4) of the Diamond Alkali Superfund Site. Field oversight was conducted by Malcolm Pirnie, Inc. (MPI) on behalf of the United States Army Corps of Engineers – Kansas City District (USACE) and the United States Environmental Protection Agency (EPA). Oversight documentation includes the following attachments and deliverables, which are attached to this memorandum:

Attachment A: Malcolm Pirnie, Inc. Oversight Forms. Field oversight covered both sediment probing and sediment coring activities. Sediment probing activities were conducted by CPG prior to sediment core collection to estimate core penetration depths in areas where coring had not been previously attempted. Oversight of sediment probing consisted of one day of field work on July 25, 2008. Sediment coring activities were conducted by CPG from July 30 to December 16, 2008 and consisted of 69 workdays in total. Oversight was conducted on eleven days (covering 16 percent of the CPG field work). Oversight was "front-loaded" to the earlier portion of the field work, occurring between July 30 and September 25, 2008.

Attachment B: Progress Memorandum to EPA and USACE on Initial Observation of CPG Sediment Coring Program (dated August 12, 2008). After four days of oversight observations, a progress memorandum was provided to EPA and USACE. With one exception (which was corrected in the field), field work was being implemented according to the approved work plan and standard operating procedures. Field observations requiring further discussion with the CPG, which were raised in the memorandum, were resolved as follows:

- Use of wire to divide core segments. A concern was raised in the memorandum that the use of a wire to
  divide core segments could result in a top-to-bottom smear zone down the center of the core segment or
  disturb and 'drag' coarse-grained materials across core segment boundaries. The CPG submitted Field
  Modification Form FM-080823-1 (effective date September 3, 2008) to address the concern and required
  the use of wide blade, stainless steel spatula(s) to separate core segments, specifically when the core
  included more than one sampling interval.
- 2. Use of core catchers. It was recommended that use of core catchers be discontinued in areas with cohesive sediments. The CPG's consultant ENSR committed to attempt to collect sediment data without a core catcher (two attempts) when working in previously uncharacterized areas.

Attachment C: Malcolm Pirnie, Inc. Quality Assurance Field Audit Report on 2008 Split Sample Collection (dated September 24, 2008). Throughout the CPG sediment coring program, oversight staff collected government split samples on behalf of EPA and USACE. Government split samples were collected from 4 percent of the CPG samples, yielding 30 split samples plus two field duplicates. Split samples were collected and shipped in 17 separate events between August 5 and December 9, 2008. A field audit was conducted on September 24, 2008 to confirm that split samples were being generated according to the Oversight Quality Assurance Project Plan and is documented on the attached form.

**Attachment D: Malcolm Pirnie, Inc. Split Sample Comparison of 2008 CPG Sediment Coring Data (dated October 5, 2009).** Split sample analytical results provided an independent analytical dataset that was compared to the CPG's sample results to investigate precision, accuracy, and potential bias. The split sample comparison showed



significant and substantial biases between the government and CPG datasets for the polychlorodibenzodioxin/furan (PCDD/F) congeners, total organic carbon (TOC), and polycyclic aromatic hydrocarbons (PAH), except for Anthracene, as documented in this report.

Attachment E: Independent Investigation Reports (prepared by CSC Environmental Solutions and Interface, Inc., dated March 16, 2010 and January 2011). In response to the observed PCDD/F split sample analytical result discrepancy reported by MPI (refer to Attachment D), an independent investigation was contracted by EPA and completed to review the CPG data generated by Columbia Analytical Services (CAS) and the government split sample data generated by AXYS Analytical Services (AXYS). The conclusion of the investigation was that the PCDD/F data generated by CAS was biased low by approximately a factor of 0.5. The investigation provided a "correction factor" to adjust the CAS PCDD/F values, assuming that the AXYS split data represented the true value, as documented in the two reports.

## Attachment A

Malcolm Pirnie, Inc. Oversight Forms

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Sediment CPG Pro	t Probe Chart be ID #:								
Probe Attempts			Penetration Depth (ft):	Water Depth (ft):	Offset:	Sediment Type:	Culki Coski valions.	Other Observations:	
	Northing  72.000 \$	Easting CPG	·		AAAAAAAA AAAAA WAAAAA	COMESTS			
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2			1'		**************************************	COMPS.	HAROKT		
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Probe Attempts	Northing	Easting	Penetration Depth (ft):	Water Depth (ft):	Offset:	Sediment Type:		Other Observations:
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TOO TOO COMMITTEE COMMITTE								
Addition	al comments on sedi	ment probing opera	ations (	if neces	sary):			
Bar	F NOT Anet	<b>46</b> 7						
Malcolm	Pirnie Inc. Oversigh	nt Staff's Name (pri	inted):					
-	Walks Am							
Overligh	t Staff's Signature	(MM)			Dat	e: 7/25/2008	)	
	Summer of the second se		,,,			- 1 - 3 - 1 Marine		

	Pass Remedial	aic River Study Investigation S	Area Sedim	CPG C ent Sa	versi mplin	ght Project g and Analysis	S		
		SEDIM	FNTF	PROBI	NG				
Probe/Core	e Designation:	Target Location				Date:	·		
Location	17年人	Northing: 741 Easting: 5993				Tury 25, 2008 Time: 12:50 F.M.			
market fill	f Contractor Sampler			Name)	):				
Sampling locations agree with those specified in the QAPP/FSP:						he probe equipren attempts?  S No	nent properly rinsed		
<b>Y</b> es	No of	THE FOT HICE	TON	AND THE PROPERTY OF THE PROPER	Comr				
Was the probe advanced using the techniques described in the SOP (two-handed technique, hands held close to chest, probe advanced robustly):  Yes No  Comment:									
Sediment I CPG Probe	Probe Chart e ID #:								
Probe Attempts			Penetration Depth (ft):	Water Depth (ft):	Offset:	Sediment Type:	Other Observations:		
	Northing	3	v 21	4.5	2/	GARACIA AND BOLL			
2	NOT PEONICED			4.51		GANGL AND ROLL			

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Sediment CPG Pro	Probe Chart be ID#:								
Probe Attempts	Northing	Easting	Penetration Depth (ft):	Water Depth (ft):	Offset:	Sediment Type:	Other Observations:		
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Addition	l comments on sedi	ment probing opera	itions (i	if neces	sarv):				
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Malcolm	Pirnie Inc. Oversigh	t Staff's Name (pri	nted):						
J.	BUGLAS AU					all del la			
Oversigh	r Staff's Signature	LUC	,		Dat	e: <u>7/25/2008</u>			

	Pass Remedia	aic River Study I Investigation S	Area Sedim	CPG C ent Sa	)versi mplin	ght Project g and Analysis	S	
		SEDIN						
	re Designation:	Target Location		KODII		Date:	35 - 0	
Locat	704#9Z	Northing: 74 Easting: 599	319 354	<b>1</b>	40 - 40 M - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 -	Time: 127.58 P.M		
Name(s)	of Contractor Sample	rs (Include Boat C	Captain	Name	):			
Sampling QAPP/FS	locations agree with	ons agree with those specified in the between attempts?  Was the probe equipment properly rinsed between attempts?						
Was the p	probe advanced using hest, probe advanced No	the techniques de robustly):	escribed	I in the	SOP (	two-handed tecl	hnique, hands held	
Sediment CPG Pro	Probe Chart be ID #:							
Probe Attempts			Penetration Depth (ft):	Water Depth (ft):	Offset:	Sediment Type:	Other Observations:	
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			MANUAL MANUAL PARK STATES				and the control of th
	al comments on sedi		ations (i	f necess	sary):		
Malcolm	Pirnie Inc. Oversigh	nt Staff's Name (pr	inted):				
Oversigh:	UCIO AVIO t Staff's Signature		<u></u>		Date		
		LARC	<u></u>			7/25/2008	
	All the state of t						

Passaid	River Study Area CPG Ov	ersig	ht Project		
Remedial Ir	nvestigation Sediment Sam	າpling	g and Analysis		
	CODE CAMPUNO				
	CORE SAMPLING				
Sediment Core Designation:	Target Sediment Core Locati	on:	Date: 7/30/08 Time: 0900 on /oc.		
Ø\$47-C1	Easting: <u>587931</u>				
Name(s) of Contractor Sampler	s (Include Boat Captain Name Is by j Steve Gae	); l.a	ski		
ENSR: Don Boye Necessary information (specifie	; Mike Hauser;	Je	ff Holzer		
Necessary information (specifie	d in core collection SOP)	Şam	apling locations agree with those		
recorded into the field notebook	<b>:</b>		eified in the QAPP/FSP:		
Yes No (comment:)			√es ΓNo		
Core advanced via:	And Annual Control of the Control of	1	s the core tubing rinsed thoroughly		
Pushing (piston/hand)	ibracore	betv	veen attempts?		
Other (comment):		Γ Yes Γ No Xn/a			
TOTAL (COMMENT).		ļ			
Was the vibracore motor turned	l on immediately after the		s a core catcher used? If so, why?		
core tube penetrated the sedime	ent?	X	res No		
Yes No		7	to achieve sufficient		
			recovery		
Were multiple attempts made to	advance the core?	Was	s a short core collected?		
Yes No Comment:		[ ]	res No		
		Sho	ort Core Designation:		
	•	Nor	thing:		
		Eas	ting:		
		Off	set from Target:		

LPRRP-03a-Core Sampling Total # of pages: 2/7

Core Atte	empt Chart			* ***		,				П		
CPG Cor	e ID#: \$\\ \phi \phi  4\\ 7	- C'1		,								
Core Attempts	Northing	Easting	Offset (ft)	(in)	Tubo Diamatar	Sample Type _ (core/ grab/field blank)	Tube Material	Penetration Depth (in)	Recovery Depth (in)	Recovery %	attempt*	Disposition of
	Northing	Lasting										
		1	<del></del>		$\dashv$							_
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									ļ	<u> </u>		
						•	4,7		ļ			
Final C /	706607.08	587833.66		3 <sup>5</sup> /	8	COCC	1,6	7.85	8	98	<b>/</b>	F
*Disposi	tion: R-Relocation/A-	Abandoned/D-Di nplete/F-Final Sav		ed/							_	
Confirm	core labeling and han	dling by checking	app:	ropria	ate	boxes be	low:					
Core I Deviation	abeled Core		4arke	d with	ן" d	<sup>J</sup> p" /	Z\St	ored (ic	ed, und	er tar	p)	
	10010 E 1	_	<u> </u>				<u> </u>	1: - 1-1-1			<u> </u>	
Correct of Proper	lecontamination proce	edures performed ions used	tor 11	ieide iminat	quı tion	pment (1 waste co	i app llecte	ed for p	ro <del>per d</del>	// spos	) 11	
1	al comments on samp						-,		<u> </u>			
						:						
Malcolm	Pirnie Inc Oversight	Staff's Name (pr	inted	 ):					<del></del>	<u> </u>		
	_	S. Fost										
Oversigh	nt Staff's Signature	Boli	~		•	Da	ate:	7 (	\$ 0 ( t	9		

Passaic River Study Area CPG O	versight Project
Remedial Investigation Sediment Sa	mpling and Analysis
CORE SAMPLING	6
Sediment Core Designation: Target Sediment Core Loca	
\$\\delta 47 C \tau \text{Northing: 706609} \\ \text{Easting: 587931}	Time: 1035
Name(s) of Contractor Samplers (Include Boat Captain Name) OSE: Capt Dave Kowalsky; Steve	Jeff Holzer
Necessary information (specified in core collection SOP) recorded into the field notebook:	Sampling locations agree with those specified in the QAPP/FSP:
Yes No (comment:)	Yes TNo
Core advanced via:  Pushing (piston/hand)  Vibracore  Other (comment):	Was the core tubing rinsed thoroughly between attempts?  Yes No n/a
Was the vibracore motor turned on immediately after the core tube penetrated the sediment?  Yes No	Was a core catcher used? If so, why?  Yes No  Driller did not believe  Tecovery could be achieve  The suggested trying next  Was a short core collected?
Were multiple attempts made to advance the core?  Yes No Comment:	Was a short core collected?  Yes No
First Attempt was advanced by hand - insufficient recovery	Short Core Designation:  \$\phi \phi 47 \cdot 4\$  Northing: 706604.64
2 2nd Attempt Driller Guiled to let core sitm 10 mini. (reject	Easting: 5 8 7 8 2 6 - 16
6 ood.	Offset from Target:

Core Atte	mpt Chart '								1 :	
CPG Core	e ID#: ØØ47	-c4				.,			'	
Core Attempts	Northing	Easting	Offset (ft)	Tube Diameter (in)	Sample Type (core/ grab/field blank)	Tube Material	Penetration Depth (in)	Recovery Depth (in)	Recovery %	Disposition of attempt*
C2	706602.80			35/8	(012	Vera	4.5		(ge/,	D
C 3	706602,80	587833.40		35/	com	√	4.5	7	80%	D
SA OF									,	
						۲				
Final C4	706604.64	587821.16		35/	8 6066	Lex	4.5	4.67	lo <sup>©</sup> /	F
	tion: R-Relocation/A S-Save until con	nplete/F-Final Sav	ed							
Confirm Core I	core labeling and har	ndling by checking Sealed	app:	ropriat	e boxes t	elow:	ored Cice	ed unde	r tarr	n)
Deviation	/		uike		C <sub>P</sub>	<i>y</i> ~ .	(10.	,	1	
Correct d	lecontamination proc	edures performed	for fi	ield eq	uipment (	(if app	licable)	:		
	r decontamination solu					collecte	ed for pi	roper di	sposa	.]
Addition	al comments on samp	oling operations (i	fnec	essary	); 	4)				
C	4 - disca	d botto	۸			1)				
		والمتعارض	, audition		•					
				***						
Malcolm	Pirnie Inc Oversight									
		S. FOST	E/	<u>ح</u> _	<del></del>					· · · · · · · · · · · · · · · · · · ·
Oversigh	nt Staff's Signature	Mont	_	•		Date:	7/30	5/0 8	3	

Total # of pages: 5/7.

Passa Remedial	ic River Study Area Investigation Sedir	a CPG Ove nent Samp	rsight Proje Iing and An	ct alysis
	GRAB SA	MPLING		·
Sediment Grab Designation	: Target Sediment	Grab Locat	ion: Date:	7/30/08
	Northing: Easting:		Time:	
Name(s) of Contractor Sam  Capt Dave Kowa  Don Boye i M  Necessary information (spe	plers (Include Boat C Isky; Steve	aptain Name Gado JeLF	e): nshi (c Holze	ST) -/ENSR)
Necessary information (sperecorded into the field noted Yes No (comment	oooks:	on SOP)	Sampling lethose specifyes	ocations agree with fied in the QAPP/FSP?
Identify the type of grab san  NO GRA  Was the sampler rinsed pro  Yes No no	B SAMPL	ES 0	BSVO	
Grab Attempt Chart  CPG Grab ID #:	Comment	/		
Grab Attempts		Offset (ft)	Disposition of attempt	
Northing	Easting		*10	Other Observations
Final				
*Disposition: R-Relocation S-Save until	n/A-Abandoned/D-Di complete/F-Final Sav	sposed/ ed		

Total # of pages: $6/7$
Confirm grab sample labeling and handling by checking appropriate boxes below:
Top 1-inch layer removed for Be-7 analysis  Remaining sample homogenized
□ VOC collected □ Sample jars stored on ice
Deviations/Comments:
Correct decontamination procedures performed for field equipment (if applicable):
Proper decontamination solutions used  Poecontamination waste collected for proper disposal
Additional comments on sampling operations (if necessary):
NO GRAB SAMPLES OBSERVED ON THIS DATE
OBSERVED ON THIS DATE
(7/30/08)
Malcolm Pirnie Inc Oversight Staff's Name (printed):
DAVID S. FOSTER
Oversight Staff's Signature 11 / Date:

LPRRP-03b-Grab Sampling

### Passaic River Study Area CPG Oversight Project Remedial Investigation Sediment Sampling and Analysis

## DECONTAMINATION (ONBOARD BOAT OR AT PROCESSING FACILITY)

DECON PROCEDURES SHOULD BE DOCUMENTED TWICE PER WEEK FOR BOTH ONBOARD AND ONSHORE SAMPLING ACTIVITIES.

TON BOTH GIBOIMS IN 2	
Were all of the following steps performed in the correct	Location:
order:	lab boat
Yes No (comment:) W/A	Time: /135
washed with laboratory grade detergent	Names of technicians:  Steve Galuashi (05
☐ rinsed with distilled water	Dare Kowalsky (OST)
rinsed with acetone, then allowed to air dry	
rinsed with hexane, then allowed to air dry	Equipment type:  Laboratory equipment
rinsed with distilled water	Ponar dredge (or other grab sampler)
	Boat equipment
Rinsate collected and disposed of in the appropriate contained	
Decontamination steps involving acetone and hexane were processing facility):  Tyes No (comment:) N/A (on both	1
Additional comments on the equipment decontamination pro-	ocess (if necessary):
Rinse W/river water be	tween attempts
c2jc3jc4.	
Malcolm Pirnie Inc Oversight Staff Name (printed):	
DAVIDS, FOSTER	
Oversight Staff's Signature:  Date:	7/30/08

### Passaic River Study Area CPG Oversight Project Remedial Investigation Sediment Sampling and Analysis

# DECONTAMINATION (ONBOARD BOAT OR AT PROCESSING FACILITY)

DECON PROCEDURES SHOULD BE DOCUMENTED TWICE PER WEEK FOR BOTH ONBOARD AND ONSHORE SAMPLING ACTIVITIES.

Were all of the following steps performed in the correct	Location:
order:	lab boat
Yes No (comment:)	Time:
	0700 - 1300
washed with laboratory grade detergent	Names of technicians:  AL MODIESH -EHSE
rinsed with distilled water	JEFF HOLZER - EN SE
rinsed with acetone, then allowed to air dry	MIKE HAUSER - ENSE
rinsed with hexane, then allowed to air dry	Equipment type:
rinsed with distilled water	Laboratory equipment
CPG BERDETS THAT LEVAL TORS TRAIL	Ponar dredge (or other grab sampler)
DEEDGE BUSED WITH RIVER WATER	Boat equipment
Rinsate collected and disposed of in the appropriate containers	
Yes No (comment:)  No solvents / percept was used on -  Decontamination steps involving acetone and hexane were perceptions.	THE CORNET VESSEL  formed under hoods (applies only to
processing facility):	
Yes No (comment:)	
Additional comments on the equipment decontamination proces	ss (if necessary):
CPG PEPOETS THAT ALL EQUATIONT PECONTAMINATION WILL BE DECONTAMIN	
PECONTAMINATION WILL BE DECONTAMIN	MED IN THE THEO
	agrama, and a second
VESSEL EQUITOR CHEATED & RUSE	With TZNEZ WATER.
Malcolm Pirnie Inc Oversight Staff Name (printed):	term to the term t
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Digrass Auro  Oversight Staff's Signature: / Date:	
OI I A M	/- n
see a manager of the Sin B/A	/2008

Total # of pages: \_\_\_\_\_

GRAB SAMPLING  Sediment Grab Designation: Target Sediment Grab Location: Date:  2008 - CLRC - O57 Northing: 713 659, 96 Easting: 591108, 96 Time: APPENDIX FROM 10:25 - 10:50  Name(s) of Contractor Samplers (Include Boat Captain Name): AL 100 0004 - ENSE TIME PARTIE CAPTURE CAPT	The state of the s		ic River Study A Investigation Se					
Sediment Grab Designation:  Target Sediment Grab Location:  Date:    S/A/2008   Time:   S/A/2008   Time:   S/A/2008			GRAB	SAMPL	ING			
Northing: 713659.86  Easting: 591108.64  Name(s) of Contractor Samplers (Include Boat Captain Name):  Name(s) of Contractor Samplers (Include Boat Captain Name):  Necessary information (specified in grab collection SOP)  Sampling locations agree with those-specified in the QAPP/FSP?  Yes No  No Comment: Tractic France  Yes No No Comment: Tractic Was Proceed to Tractic France  Yes No No No Comment: Tractic Was Proceed to Tractic France  Northing Easting  Northing Easting  Northing Easting  Other Observations  The State of Tractic France  Other Observations  The State of Tractic France  Other Observations  The State of Tractic France  The State of Tractic France  Other Observations  The State of Tractic France  The State of Tractic F	Sedime	nt Grab Designation:	Target Sedime	ent Gral	Locat	ion:	Dat	e:
Name(s) of Contractor Samplers (Include Boat Captain Name):  Name(s) of Contractor Samplers (Include Boat Captain Name):  AL HODJOSM - ENSE  JETT HOLZER ENSE  Necessary information (specified in grab collection SOP)  recorded into the field notebooks:  Yes No (comment:)  Was the sampler rinsed properly between multiple grab attempts at the same location?  Yes No Na Comment: There were no multiple grab attempts at the same location?  Yes No No Comment: There were no multiple grab attempts at the same location?  Yes No No Comment: There were no multiple grab attempts at the same location?  Yes No No Comment: There were no multiple grab attempts at the same location?  Yes No No Comment: There were no multiple grab attempts at the same location?  Yes No No Grab Attempt Chart  TSI Grab ID #:  On Grab Attempt Chart  TSI Grab ID #:  Other Observations  There are sampler satisfies at the same location?  Other Observations  There are sampler attempts at the same location?  There are sampler attempts at the same location?  Yes No No No Comment: There were no multiple grab attempts at the same location?  Yes No No No Comment: There were no multiple grab attempts at the same location?  Yes No Other Observations  Other Observations  There are sampler at the same location?  Other Observations  There are sampler at the same location?  Other Observations  There are sampler at the same location?  Other Observations	フ.ヘカネ	- (120-057	Northing:	يغرضون رود	a constr			
Name(s) of Contractor Samplers (Include Boat Captain Name):  AL TODGOSM - ENSE  JEFF HOLZER ENSE  Necessary information (specified in grab collection SOP) recorded into the field notebooks:  Yes No (comment:)  Was the sampler rinsed properly between multiple grab attempts at the same location?  Yes No No Comment:  Was the sampler rinsed properly between multiple grab attempts at the same location?  Yes No No Comment:  The sampler rinsed properly between multiple grab attempts at the same location?  Yes No No Comment: The sampler rinsed properly between multiple grab attempts at the same location?  Yes No No Comment: The sampler rinsed properly between multiple grab attempts at the same location?  Yes No No Comment: The sampler rinsed properly between multiple grab attempts at the same location?  Yes No No Sampler Type Property Response for the property response fo	Easting: 59108 Ad							a de servicio
Necessary information (specified in grab collection SOP)  Necessary information (specified in grab collection SOP)  Yes No (comment:)  Sampling locations agree with those specified in the QAPP/FSP?  Yes No  Identify the type of grab sampler used (e.g., ponar dredge, van veen sampler, or box corer):  Was the sampler rinsed properly between multiple grab attempts at the same location?  Yes No No A Comment: The Sampler was properly between the same location?  Yes No No A Comment: The Sampler was properly between the same location?  Yes No No Recessary information (specified in grab attempts at the same location?  Yes No One Comment: The Sampler was properly between the same location?  Yes No One Comment: The Sampler was properly between the same location?  Yes No One Comment: The Sampler was properly between the same location?  Yes No One Comment: The Sampler was properly between the same location?  Yes No One Comment: The Sampler was properly between the same location?  Yes No One Observations  Northing Easting Other Observations  All Tills of Sampler was properly between the same location?  Other Observations  The Sampler was properly between the same location?  Other Observations  The Sampler was properly between the same location?  Other Observations  The Sampler was properly between the same location?  Other Observations  The Sampler was properly between the same location?  Other Observations  The Sampler was properly between the same location?  Other Observations  The Sampler was properly between the same location?  The Sampler was properly	Name(s)	of Contractor Same						
Necessary information (specified in grab collection SOP)  Necessary information (specified in grab collection SOP)  Yes No (comment:)  Was the type of grab sampler used (e.g., ponar dredge, van veen sampler, or box corer):  Was the sampler rinsed properly between multiple grab attempts at the same location?  Yes No In Comment: The sample was properly between the same location?  Yes No In Comment: The sample was possible to the sample for	OCEAN	* SURVEY, INC. D	WE KOWALSKY	Captan	(4)	(). / 		
Necessary information (specified in grab collection SOP) recorded into the field notebooks:  Yes No (comment:)  Was the type of grab sampler used (e.g., ponar dredge, van veen sampler, or box corer):  Was the sampler rinsed properly between multiple grab attempts at the same location? Yes No No Comment:  Yes No No Comment:  Yes No Other Observations  Northing Easting  Northing Easting  Your Property of the Comment of the Comm		<u> </u>	WE GROOM SKY	LMM		W 1		
Ves   No   Identify the type of grab sampler used (e.g., ponar dredge, van veen sampler, or box corer):   Policy   Delegation   Statistical Flattical   Flattical Flattical Flattical   Flattical Flattical Flattical   Flattical Flattical Flattical   Flattical Flattical Flattical   Flattical Flattical Flattical   Flattical Flattical Flattical Flattical Flattical Flattical   Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Flattical Fl	Necessa	ry information (spec	ified in grab collec	tion SO	P)	Sam	pling	locations agree with
Identify the type of grab sampler used (e.g., ponar dredge, van veen sampler, or box corer):  Police Decree w/ STABILIZATION FRANCE  Was the sampler rinsed properly between multiple grab attempts at the same location?  Yes No na Comment: The STABILIZATION FRANCE ROOM PROPERTY RESERVED BY  Grab Attempt Chart  TSI Grab ID #:  Office (fi)  Office (fi)  Northing Easting  Northing Easting  Northing Farms SATIRE  Grab Attempt Chart  Forms Sample Type  Identify the type of grab sampler, or box corer):  Office Room Property between multiple grab attempts at the same location?  Yes No na Comment: The Sample Room Property Room Propert	April 1							
Was the sampler rinsed properly between multiple grab attempts at the same location?  Yes No n/a Comment: The sample was properly between multiple grab attempts at the same location?  Yes No n/a Comment: The sample was properly between multiple grab attempts at the same location?  Yes No n/a Comment: The sample was properly between multiple grab attempts at the same location?  Yes No n/a Comment: The sample was properly between multiple grab attempts at the same location?  Yes No n/a Comment: The sample was properly between multiple grab attempts at the same location?  Yes No n/a Comment: The sample was properly between multiple grab attempts at the same location?  Yes No n/a Comment: The sample was properly between multiple grab attempts at the same location?  Yes No n/a Comment: The sample was properly between multiple grab attempts at the same location?  Yes No n/a Comment: The sample was properly between multiple grab attempts at the same location?  Yes No n/a Comment: The sample was properly between multiple grab attempts at the same location?  Yes No n/a Comment: The sample was properly between multiple grab attempts at the same location?  Yes No n/a Comment: The sample was properly between multiple grab attempts at the same location?  Yes No n/a Comment: The sample was properly between was properly betwe	108	ino (comment)				¥Y	es	No
Grab Attempt Chart  TSI Grab ID #:  Grab Attempt Chart  Offset (ft)  Offset (ft)  Other Observations  Northing  Easting  Northing  Easting  Forther  Forther  713 653 44 591112 19 6.910 Grass F # 1 . SANGO	Was the Yes	sampler rinsed prope	erly between multi	ple grab	attemi	ots at 1	the sa	ame location?
Grab Attempts  Northing  Easting  Northing  Easting  Northing  Easting  Formul  GRAB SATTELE  T13.053.44  591112.19  6.90  GRAB  FINAL  GRAB  FORMUL  GRAB  FORMUL  GRAB  FORMUL  GRAB  GRAB  FORMUL  GRAB	Grab Att	empt Chart						
Northing Easting   Northing Easting  Northing Easting  Portuge  G-1 7/3/053.44 59/1/2.19 6.96 GRAS F #1. SAVEO	TSI Grat	D ID #:		-,				
G-1 713653.44 591112.19 6.96 GRAS F #1. SAVED	Grab Attempts	Northing	Easting	Offset (ft)	(grab/field blank)	Sample Type	Disposition of attempt*	Other Observations
Volas Lizas Lucios						1		
6.2 713653.34 591108.04 - GRAS F #2. SANGO	4-1	713653.44	591112.19	6.96			graditi	
	<u>4.2</u>	713653.34	591103.04		8			4748 SAMPLE #2. SAMBO
Final	Final		and discussion and extraored size and discussion are supply as the contract to the contract and an extraored a					

### LPRRP-03b-Grab Sampling

Total # of pages: 2 Confirm grab sample labeling and handling by checking appropriate boxes below: Top 1-inch layer removed for Be-7 analysis Remaining sample homogenized Sample jars stored on ice Deviations/Comments: NONE HOTEO Correct decontamination procedures performed for field equipment (if applicable): Proper decontamination solutions used Decontamination waste collected for proper disposal FIELD EQUATENT WAS ONLY BUSED WITH TRUE WATER. Additional comments on sampling operations (if necessary): Malcolm Pirnie Inc Oversight Staff's Name (printed): Oversight Staff's Signature Date:

Total # of pages: 2

Passai	c River Study Area CPG C	)versig	ht Project		
	nvestigation Sediment Sa				
	<del>-</del>		,		
	CORE SAMPLING	3			
Sediment Core Designation:	Target Sediment Core Loca	tion:	Date:		
			8/4/2008		
2008-424-057	Northing: 713659.80		Time: ARROX.		
Name(s) of Contractor Sampler	Easting: 591103. 00		0815-1015		
REAL SURKY, INC. DAVE	KOWALSH KOMPAH)		L MODÍNSKI - ENSE FF HOTZEE - ENSE		
,	GADOMSKI KMED		YEHAUSER EHSE		
Necessary information (specifie			oling locations agree with those		
recorded into the field notebook			fied in the QAPP/FSP:		
Yes No (comment:)		YYe	es No		
Core advanced via:	•		the core tubing rinsed thoroughly		
Pushing (piston/hand)	bracore	ž.	een attempts?		
Other (comment):		Yes No ∜n/a			
		MADE FOR EACH CORE.			
		1,4,5	the state of the s		
Was the vibracore motor turned		Was a	a core catcher used? If so, why?		
core tube penetrated the sedimer	nt?	Ye	s No		
Yes No		408	e energy to		
		51	FOR 10-MIN. PRIDE TO		
Were multiple attempts made to	advance the core?		short core collected?		
Yes No Comment:		Ye			
Comment.		ļ,			
		Short	Core Designation:		
			TO THE STATE OF TH		
		North	ina		
	NOLLII	mg.			
			***************************************		
		Eastin	g:		
			THE PARTY AND ADDRESS OF THE PARTY AND ADDRESS		
		and the			
		Offset	from Target:		
	***************************************	·····			

Core Att	empt Chart									
TSI Core ID #:										
Core Attempts	Northing	Easting	Offset (it)	Tube Diameter (in)	Sample Type (core/ grab/field blank)	Tube Material	Penetration Depth	Recovery Depth (納) (評)	Recovery %	Disposition of attempt*
4	713658.34	591107.37	0.91	35/8	CORE	2	9.8'	8.45	86	-
2	713657.85			3%	CORA	ž.	9.81	9.1	93	fine
Final *Disposi	tion: R-Relocation/A	-Abandoned/D-D	ispose	d/			VA TERRATANA ANALANA			
Core I Deviation	core labeling and han abeled Core  15: APPROX Z" OF econtamination process	Sealed M	Aarked - OK	d with "l	Up"	Sto	1 UPO	i Pe	_	
	decontamination solut								posal	
· EXC	THROUGH LE	early feat	1	o 90					· ·	timber Commence
5E-0	SECTION #1 - 4' OF BLACK SIGT, APPECK, 0,45 OF CI									
			1	للم ويبيدي فللمستضم المقل سيق مناو مناه المستمامة إن	a garan kana dalah daga da sama da sam	accine of the below	ة المشارعة المي <sup>ان المطالعة ا</sup> لمطالعة الميان	anggine (1914 September) da Language (1914 September)	a fare part to deposit or the	an a Marian samunda (auto André Malainean Aigi
	ローチューイラリ Pirnie Inc Oversight			=4104°	~2-/-	1 5	"LA v	0.5	)AMS	7
	Jama's Auro									WAII INDIVIDUALLY
	Staff's Signature	ad	**************************************	AAAA	Date		4/20	38		The state of the s
	Park the same									

Total # of pages: 4 of 6

		ic River Study Ar Investigation Sec				
		GRAB S	SAMPL	ING		
Sedimer	nt Grab Designation:	Target Sedime	nt Grab	Locati	on: Dat	e:
Z00?	o - Catala - 049	Northing: 708	N % 2.77	one have	Tin	3/6/2008
-		Easting: 58	7179.	00		0915
Name(s)	of Contractor Samp	lers (Include Boat	Captain	Name)	: JEFF	HOLZER - FUNDELL HOUSER - ENSE
to art second to art 12		TEVE GADONS				BOYE - EASE
	ry information (speci l into the field notebo		ion SO	P)		locations agree with
Yes	No (comment:)	JOKS.			Yes	cified in the QAPP/FSP?
Idantify	the type of grab some					
	the type of grab sam					
Was the	<u>we. ワモロぐん ()</u> sampler rinsed prope	21'X(2") W)	STABI	L1 Z.AT	to at the	And Comments of the Comments o
Yes	the contract of the contract o	Comment:	не дгао	attemp	us at the sa	ame location?
Grab Att	empt Chart					
TSI Grat	) ID #:					
Gra			Of Of	(gr	S D	
Grab Attempts		And de constant of the constan	Offset (ft)	(grab/field blank)	Disposition of attempt*	
temp			f	eld b	Sition	
Ts		Thomas and the second s	TO THE PERSON NAMED IN COLUMN	lank)	1 of a	
			1.6.4.4.0.0.0.0.0.0.0.0.0.0.0.0.0.0.0.0.0	_	atten	
	Northing	Easting	W 11	A VIII A	*1dt	Other Observations
, may 8	22.00	79.60	4.57	FONAS	and the second	
41	702542.55 27.50	79.35	0.37	Pomias	5 F	
<u> </u>	22 .63 70832 <b>3</b> .83 27 .00 7083   4 .51	589190,42	<i>4:27</i>	G 2000		
43 Final	708329.31	539133.40	5.45	1848 3849	)	
Final		Annual Common Colombia (n. 1885), annual Colombia (n. 1885), annual Colombia (n. 1885), annual Colombia (n. 18				
ionneit 1	ion: R-Relocation/A	- Abandonad/D Dia	magadi			

## LPRRP-03b-Grab Sampling

Total # of pages: Z of 6

Confirm grab sample labeling and handling by checking appropriate b	voyaa halaayy
Top 1-inch layer removed for Be-7 analysis Remaining sample hor	nogenized
VOC collected  ✓ Sample jars stored on ice	
Deviations/Comments:	
Correct decontamination procedures performed for field equipment (in	f applicable):
Proper decontamination solutions used Decontamination waste co	
NO PERCONTAMINATION PERFORMS ON VESCIL OTHER	- THAN ZANDAN
DEEDGE W/ EINER INATER ERTINGEN GRAE SATTER	in cause attack.
Additional comments on sampling operations (if necessary):	Activities and the second seco
G1 - SECONDUCT APPEAR TO BE FRIMENY F	
91 - SEDIMENTS APPEAR TO BE FRIMENY F W/SMALL AMON'S OF DREGAMIC DECES.	
to all the second that it is a second to the second to	
12 m Adamson EO	
GZ- ABANDONED	
WC2-VA: AUY BONG THE CORP RECORDER	STATE AT THE
#3- VOC ONLY FROM THIS GRAB. SEDIMENT BE FRIMELY F-C SAND.	
to tarrely 7-C sand.	
Malcolm Pirnie Inc Oversight Staff's Name (printed):	
water with the oversight start's realite (printed).	
Dayung Auro	
Oversight Staff's Signature / Dat	2.
Dat	c.
S WINN	8/./-
	8/6/2008

Total # of pages: 3 of-

#### Passaic River Study Area CPG Oversight Project Remedial Investigation Sediment Sampling and Analysis CORE SAMPLING Sediment Core Designation: Target Sediment Core Location: Date: 8/0/2008 2008-6-26-049 Northing: 70 8327. 00 Time: 0810-0845 Name(s) of Contractor Samplers (Include Boat Captain Name): TERFHOLZER - ENSE CREAM SURVEY, INC. DAVIC KOWALSKI - CAPTIN MIKE HOUSER - EHSE STEVEL STADOMS W- MATE DON BOYE- FINSE Necessary information (specified in core collection SOP) Sampling locations agree with those recorded into the field notebook: specified in the QAPP/FSP: VYes. Yes No (comment:) i No Core advanced via: Was the core tubing rinsed thoroughly Vibracore between attempts? Pushing (piston/hand) Yes No Other (comment): Was the vibracore motor turned on immediately after the Was a core catcher used? If so, why? core tube penetrated the sediment? Yes V. 46 2 FAILED ATTENDED WOUT. VYes No FOR CZ, DID NOT OSSERVE CL (SINE HOTE) WILL BE USED PER ELISE Were multiple attempts made to advance the core? Was a short core collected? No Comment: VYes No Z SEFERAL COMES COLLECTED AT Short Core Designation: ( < - 2 ) TARLY CON - 2' THIS LOCATION. BOTH ENCOUNTIE REFUSAL AT PEPITO LESS THAN THEIR come consent musters Northing: 708325・4ら MESPECTIVE TARGET PENETRATIONS OF BI EACH. Easting: 5名9/33.0で Offset from Target: 4,34

Total # of pages: 4 of Lo

Core Atte	empt Chart	***************************************				e-e-e				<del></del>
	*									
Core Attempts	Northing	Easting	Offset (ft)	Tube Diameter (in)	Sample Type (core/ grab/field blank)	Tube Material	Penetration Depth (in)	Recovery Depth (in)	Recovery %	Disposition of attempt*
(C1) 1 (C2)	70 8328, 47		1.47	35/8	CAL	Ž	4.5	4.45		Parameter Parame
2	708325.45	589:83.05	431	3º/b"	Cothetien	CX.	7.5	J. 51	87	Library Singer Co.
Final				C T T T T T T T T T T T T T T T T T T T	THE PROPERTY OF THE PROPERTY O		New particular and a second se	700000000000000000000000000000000000000		
Confirm of Core L Deviation  Correct d  Proper	core labeling and han abeled Core as:  econtamination proceduced decontamination solution and a same all comments on same all comments	nplete/F-Final Savidling by checking Sealed  Edures performed ions used  Detailing operations (i)	ed appr for fireconta	opriate d with ''U eld equi mination	Jp" fipment (if	Sto app	ored (ice licable) d for pr	: oper dis	posa	<u> </u>
1) ARENED AT DOCK AT 0730 AS PARECURS BY ENSE. DID NOT ARENE AT CORING HOLATION UNTIL 0810, AFTER CONFLICTION OF INITIAL CORD. TARGET PENETRATION 8', REFUSAL AT 65'  SECT. # 1 - 3.66': BLACK FING- COMPRESAND  SECT. # 2 - 05': DISCARD  2) CZ ADVANCED IN CORD CATCHER. REFUSAL AT 7.5'  SECT. # 1 - 4' BLACK SAND  SECT. # 2 - 2.1' BLACK SAND - RED/BEN SANDY CHAN  0.4' DISCARD - RED/BEN SANDY CHAN										
	Pirnie Inc Oversight	Staff's Name (pri	nted):	a marangan a masan a masan a magan a ayan a ga an a D	***************************************	antholish aft a af dhaudh aft a an		e en un en	A A A A A A A A A A A A A A A A A A A	
Oversight	Staff's Signature	KE!			Dai		/cel	200 B		

Total # of pages: 5 of 6

Passai	c River Study Area CPG Ov	/ersiç	ght Project			
Remedial I	nvestigation Sediment San	npling	g and Analysis			
	000=04404410					
	CORE SAMPLING	······································				
Sediment Core Designation: Target Sediment Core Location: Date:						
2008-CLEC-060	Northing: 710442.06 Easting: 592488-00		3/6/2008 Time: 1049			
Name(s) of Contractor Sampler	s (Include Boat Captain Name Kowalski – LAPTA	~	Off HOLZER - EMBEL ALLE HAUSER - EMBRE			
	- CADOMSH - MARE		Port Boyer - Euse			
Necessary information (specific recorded into the field notebook		spec	pling locations agree with those ified in the QAPP/FSP:			
Yes No (comment:)		✓ Y	es No			
Core advanced via:  Pushing (piston/hand)  Other (comment):  Was the core tubing rinsed thoroughly between attempts?  Yes No Na  Head, Recontaminated core  Head, Secontaminated core						
Was the vibracore motor turned core tube penetrated the sedime		EN	a core catcher used? If so, why? es No ISE WILL USE CORE CATURE THE CHARGETURE OF SOP OBTAINED FROM EPA			
Were multiple attempts made to advance the core?  Was a short core collected?  Yes No Comment:  OHE ATTEMPT WAS MADE TO Short Core Designation:						
		Nort	hing:			
		East	ing:			
		Offs	et from Target:			

Total # of pages: \_\_\_\_\_\_\_\_

Core Atte	empt Chart									
TSI Core	e ID #:									
Core Attempts	Northing	Easting	Offset (ft)	Tube Diameter (in)	Sample Type (core/ grab/field blank)	Tube Material	Penetration Depth	Recovery Depth (14)	Recovery %	Disposition of attempt*
<u></u>	716439.49	592486.5	2 -9 <b>2</b>	35/8	C025_	12	8-5	8.7		F
<u> </u>	7110441.12	592484.81	**************************************	3º/8	cose	ķ.	9.8	9.8'	190	F
Final										
Proper	lecontamination proce	ions used De	conta	minatior					sposa	1
<u> </u>	TO PROCESS	HETERATION IS  1-1TO Z  THE FROM  FOR BOTTOM  LOST FROM  ENETERATION	85 25 17. 05 TE	COZI	S FO E CA E COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR COUR	TON	TEAN SI APP	Y SPOI TAD TRATIO	TO 4"	of 59.8
Same	LOF POPAR SATS CAPTURES Pirnie Inc Oversight	0 FOR DI	SF2	SPA		- Ca	~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~			
Oversight	t Staff's Signature	SA			Da		1612	200 B		·

### Passaic River Study Area CPG Oversight Project Remedial Investigation Sediment Sampling and Analysis **Daily Oversight Summary Form** Form Designation: LPRRP-01-Summary Form Date: 8/14/2008 Weather Conditions: Affect Sample Quality: Air Temp (F): 24-Hour precipitation: Min: ~ 750F AM: CLEAR & WARM, Yes SHGHT BUCCL Max: ~ 8395 (if yes, describe in harm from End: problems section.) Water Temp (F): PM: When & SHAHIN Yes No v 75°F Amount (in): (if ves, describe in DECEMBE problems section.) Oversight Staff Assignments: Other personnel conducting Team/Activity Observed: oversight/official visitors: Name: EXILAR FIRMS DANC FOUALS 4 - 05 TOHA 20/15\_ TIME GADOMAKI- OS! COEMMINES JAC HOLZEL-CHIE Ticario - east COSCI GRAS SATIONS MUCHAUSOR - EASE A SOISTING NO COME ONE SACRET TRANSPORT Deviations from USEPA-approved work plans: ALL COSE ATTENDED. Core collection activities: Total # Observed/Reported: # Reported: Cores: Blanks Abandoned Other Tube Material TSI Core ID# Recovery Description (%) and Type/Length Disposition 2008 - CLILL - 07/ C: A. 100 % T SAYED FOR PROCESSING C2 5.0 TOP LOST " COPPLAREA HON-150 C3 Z.C 87% DAVED FOR PROCESSING 2008 - CUIL - 073 C1 NO FECONERY CZ PARTEMON 5-3" % RELOYDED TOO IN P. FAULTY L3 40 TOLLOWERY 95.5% SAYED FOR PROCESSING 64 43

# 

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TSI Core ID #	TSLSa	ample ID #	Comments/Analyse	es
A				
	The second secon	Administration of the second of the second s	***************************************	
olit sample activity o	comment:		enge orsaenco	
MULTIPLE CE	2008-43	ente L-073 T	SOSTALL AS	take_
MUMTRA CONTROL  TOCATION  ATT HOCATION  YOU  fety concerns/issues	2008 - 45 U16.			
MUMINE CATION YOU	(if any):			
fety concerns/issues	3 (if any):			
fety concerns/issues	3 (if any):			

## 

Miscellaneous comments	- 414		
Core/grab collection tasks completed by CPG: Cores: 7 Van Veens/Grabs: 10 Abandoned: 3 Blanks: 5 Decons:	Field activities observed by government oversight personnel: Cores: 6 Van Veens/Grabs: 10 Abandoned: 3 Blanks: Decons:	Total number of cores/grabs processed by CPG: Cores:  Van Veens/Grabs:  Blanks:  Samples shipped:	Lab activities observed by government oversight personnel: Cores: Van Veens/Grabs: Blanks: Decon Activities: Splits Taken:
Malcolm Pirnie Inc Field	Representative Signature:		
Printed Name:	Ase		

Passaic River Study Area CPG Oversight Project						
Remedial II	nvestigation Sediment San	nplin	g and Analysis			
CORE SAMPLING						
Sediment Core Designation: Target Sediment Core Location: Date:						
	8-CLZC-07  Northing: 72.0685.00 Time:					
2008-CLRL-071	Easting: 59075900		0730-0840			
Name(s) of Contractor Samplers	s (Include Boat Captain Name	:):	the House test			
¥		æ	John waske - ensiz			
Necessary information (specifie		1	pling locations agree with those			
recorded into the field notebook		( " Jel	ified in the QAPP/FSP:			
Yes No (comment:)		Y	es No			
Core advanced via:	*	Was	the core tubing rinsed thoroughly			
Pushing (piston/hand)	bracore	betw	/een attempts?			
Other (comment):			es No n/a			
Ouer (comment).		SATURATE SENA TOSES				
		(J) 1/6	A TOTAL OF THE POST OF THE POS			
Was the vibracore motor turned	on immediately after the	Was	a core catcher used? If so, why?			
core tube penetrated the sedimer	nt?	Yes No				
Yes No			- correct ord space # 2-			
		Į	HS FORM - OTTORE			
Were multiple attempts made to	advance the core?	<del></del>	a short core collected?			
Yes No Comment:	adiana in voice.	1 25	es No			
Comment						
		Shor	t Core Designation: 🚄 🌋			
		Nort	hing: 7266 82.13			
		Easti	ng: 590753.14			
			الم الله الم الله الله الله الله الله ال			
		7 V 27	AND when h			
	} }	Offs	et from Target: 🚁 . 53'			
			naver de la constante de la co			

Total # of pages: \_\_\_\_5 of ||

Core Att	empt Chart						<del></del>			
TSI Core	TSI Core ID #: 2008-07!				,,					
Core Attempts	Northing	Easting	Offset (ft)	Tube Diameter (in)	Sample Type (core/ grab/field blank)	Tube Material	Penetration Depth	Recovery Depth	Recovery %	Disposition of attempt*
C-2-	72668448		1-79	35/g"	Lat Kana	Ž	3.3	4.1	100	
C2.	726684.75	59675A50	4.5]	390"	COCE	<u>E</u>	3.8	5.0	120	A
<i>C</i> 3	720082 13	590753.14			Love	Į.	3,0'	2-6	87	
Final										
Confirm Core I	*Disposition: R-Relocation/A-Abandoned/D-Disposed/ S-Save until complete/F-Final Saved  Confirm core labeling and handling by checking appropriate boxes below:  Core Labeled Core Sealed Marked with "Up" Stored (iced, under tarp)  Deviations:									
	lecontamination proc decontamination solu	-							posal	
Addition	al comments on samp	oling operations (i	fnece	essary):						
Luci de de	3.60' BLACK S CONTESTED HIS CHARGEMENTONI TORENT TORES WILL CONTINUE	ove cathout reproved the french is the to be	i. E Cast Syr	5242 24 50	richt Athir Sop	. 15	* Th		-40T	
CZ :-	TOP OF LOR	£ 605T:								
0.0' COMPANY SAND.										
Malcolm	Pirnie Inc Oversight	Staff's Name (pri	inted):	en e	emercurescent Mithiela Esterie					
Oversigh	تربیک کمپین t Staff's Signature /		***************	·/	Da	te:				
	Samuel B	LOW					14/	200 <u>8</u>		

Total # of pages: 6 of 1

### Passaic River Study Area CPG Oversight Project Remedial Investigation Sediment Sampling and Analysis **GRAB SAMPLING** Sediment Grab Designation: Target Sediment Grab Location: Date: 8/14/2003 Northing: 72.0085.00 Time: 2008 - 422 - 07/ Easting: 590759.00 0840-Name(s) of Contractor Samplers (Include Boat Captain Name): JOHN HOLDER - ENDE OCEAH SVENEY INC. IME KOWASKI - CAPITH MILL HOUSE - CASE JOHN WALKER TENSE TINE GARDONSIG -- ATE Necessary information (specified in grab collection SOP) Sampling locations agree with recorded into the field notebooks: those specified in the QAPP/FSP? Yes Yes No (comment:) No Identify the type of grab sampler used (e.g., ponar dredge, van veen sampler, or box corer):PONCE DECORE W STABILIZATION FRAME. Was the sampler rinsed properly between multiple grab attempts at the same location? Yes Na Comment: WATER PEATH ASPENX. 110.51 Grab Attempt Chart TSI Grab ID #: Sample Type (grab/field blank) Grab Attempts Disposition of attempt Other Observations Northing Easting 590757.58 8.17 PEDRIS 72477-13 THOUS Za. LO RECIONA 72-4684.07 596750.00 9.05 ELGAMED 59019.00 72-4484.07 PROCE WOLLD \*Disposition: R-Relocation/A-Abandoned/D-Disposed/ S-Save until complete/F-Final Saved

67 => 720686.61 590752.74 6.46 gares

Total # of pages: 7 of 1
Confirm grab sample labeling and handling by checking appropriate boxes below:  Top 1-inch layer removed for Be-7 analysis  Remaining sample homogenized
√OC collected ★ Sample jars stored on ice
Deviations/Comments:
Correct decontamination procedures performed for field equipment (if applicable):  Proper decontamination solutions used Decontamination waste collected for proper disposal
Additional comments on sampling operations (if necessary):
* 95; VOC'S CONTED, BE-7 AND COMPOSITE
<b>,</b>
Malcolm Pirnie Inc Oversight Staff's Name (printed):
Oversight Staff's Signature Date:

Total # of pages: 8 of il

### Passaic River Study Area CPG Oversight Project Remedial Investigation Sediment Sampling and Analysis **CORE SAMPLING** Target Sediment Core Location: Sediment Core Designation: Date: 8/14/2008 2008 - CLEC - 074 Northing: 72 8361.00 Time: Easting: 596913.00 0940-1320 Name(s) of Contractor Samplers (Include Boat Captain Name): MIKE HAUSER - BASE OCEAH SURVEY, I'VE I DAVE KONALSKI - CAMIN. JEFF-HOLZER - ENE STRUCE GADON SKY - MATE JOHN WALKE - EMSTE Necessary information (specified in core collection SOP) Sampling locations agree with those specified in the QAPP/FSP: recorded into the field notebook: Yes No (comment:) Yes □ No Was the core tubing rinsed thoroughly Core advanced via: **V**ibracore between attempts? Pushing (piston/hand) VYes No Other (comment): Was the vibracore motor turned on immediately after the Was a core catcher used? If so, why? core tube penetrated the sediment? Yes No Yes No PURSUALT TO ENSIGN HTTOCHESTON OF SOF. Were multiple attempts made to advance the core? Was a short core collected? Yes No Comment: Yes No Short Core Designation: ८५ CL - FIRST ATTEMPT WAS LOST UPON TRETRIENAL. CORE TURE AND CORE CATCHER THEO Northing: 728358-85 W/RNOZ WATER SETWEEN ATTEMETS Easting: 590915.98 62 - PETALLICZ, HOWEVER TRECOVERY uncertains Offset from Target: 3.57 63- AMAMOON 12 CA - RETAINED FOR PROCESSING CS - RETAILED FOR THE COMING

Total # of pages:	9 of 11	į
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Core Attempt Chart										
TSI Core	ID#: 2008 - C	<u> 126-073</u>								
Core Attempts	Northing	Easting	Offset (ft)	Tube Diameter (in)	Sample Type (core/ grab/field blank)	Tube Material	Penetration Depth	Recovery Depth	Recovery %	Disposition of attempt*
C.	728560-01	596911.73	lutur.	3%	C25%	£	3.3	***	re-spirance;	A
L 2	728360.22	59090833	4.73	3 <sup>5</sup> /8	<u>ರಾಕ್ಷ್</u>	Ž	3.3	*	A.	(HORF
43	728350.59	596908.54	427	3 <sup>5</sup> /8	LOUGUS	Ž	4-71	*****	systems	4
Final				35/8	COUL	Ě	4.5	4.3		
*Disposit	ion: R-Relocation/A		spose							
Confirm core labeling and handling by checking appropriate boxes below:  Core Labeled Core Sealed Marked with "Up" Stored (iced, under tarp)  Deviations:  Correct decontamination procedures performed for field equipment (if applicable):  Proper decontamination solutions used Decontamination waste collected for proper disposal  Additional comments on sampling operations (if necessary):										
CZ: ECCOCK ONKNOWN DUE TO MURKY WHERE IN CORE TUBE, APPEARS TO BE GREATER THAN 3', CORE PETANCIO FOR PROCESSING.  C3: CARE ABANCOURO DUE TO MADE QUATE THE COREY.  CA: CORE RETAINED FOR PROCESSING.										
Malcolm	Pirnie Inc Oversight	メラフ そって Staff's Name (pri	F호onted):	CESTA.	en de la companya de	the state of the s	A	w,,,,,		n erre e er e pen per mus mennen set men um er e pen s
	Staff's Signature				Dat		M/2	-00B		

Total # of pages: 10 of 1)

		River Study Are			-	-	1		
		GRAB S	AMPLI	NG					
Sedimen	t Grab Designation:	Target Sedimer			n:	Date	:		
8/1a									
2008 - CLEL-073 Northing: 72 8361.00 Time:									
~ :	Easting: 596913.00 1320  Name(s) of Contractor Samplers (Include Boat Captain Name):								
Name(s)	SUZYEX, INC. !	ers (Include Boal C Parc Voyans	_aptain <b>3</b>	Name): Carti		, ,	HE HAVORE ENSE		
	<del>-</del>	STEVE GARROT					H WALKEZ - EHOR		
	y information (specif		ion SOI			• •	locations agree with		
recorded Ves	No (comment:)	oks:			inose Y		ified in the QAPP/FSP?		
Yes	No (comment)			:	* Y	es	; INO		
Identify t	the type of grab samp	ler used (e.g., pon	ar dredg	ge, van v	veen	samp	ler, or box corer):		
FOHM	2000000	4/5148147	44TT0	15	Zanfilio A		and the same of th		
	sampler rinsed proper								
Yes	No n/a	Comment:	C,	1			Ì		
Grab Atte	empt Chart								
TSI Grab	o ID #:								
Ō			Q Q	(g)	-	D			
<b>Grab Att</b> empts			Offset (ft	Sample Type (grab/field blank)	_	Disposition of attempt*			
A B			(f)	řeld	1	siti			
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	:			\ \dot{\dot{\dot}}	TAN TOTAL MARKET	of at	To control of the towns		
					A A Paradous Au accounts	tem	Of American Carlotter		
	Northing	Easting				7*	Other Observations		
						å			
42	728354.17	596915.20	7.18	444	3	<u>A</u>	VE085		
•	728354.26			,	-	A	5,245		
62		1 5 G 18 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5 5	8-10	and has 14 m		1.3 A	<u> </u>		
G3 Final	728363:13	<u> 1909) 04</u>	3.05	GRAB		4	70.40		
Final	7+ Q 2 & & / .	2. 6. 1. 8. 1. 6. 2.7	2 D.	\$ 28 -00 3-56	- Company				
and the last of th	728355・69 tion: R-Relocation/A-			6-78.4 D					
nishasii		plete/F-Final Sav	•				PUTER TO AMANA		
EA.		5-9-9-15-70	~~~~~~~~~~	C- 200	4	greek greek	SAMPLE COLLECTION OF THE		

95 728360.37 IPRRP-03h Grab Sampling, Page 1 of 2 596928.67 7.70 989 F

sample, contamp

LPRRP-03b-Grab Sampling
Total # of pages: 1 of 1
Confirm grab sample labeling and handling by checking appropriate boxes below:  Top 1-inch layer removed for Be-7 analysis  Remaining sample homogenized
VOC collected Sample jars stored on ice
Deviations/Comments:
Correct decontamination procedures performed for field equipment (if applicable):  Proper decontamination solutions used  Decontamination waste collected for proper disposal  DECONTAMINATION OF POWER DECONE PROFORMED SETTINGED LINES OF THE DECONE
Additional comments on sampling operations (if necessary):

Malcolm Pirnie Inc Oversight Staff's Name (printed):	
Douglas Also	
Oversight Staff's Signature	Date:
AULUL	8/14/2008

		Daily Oversi	ght Summary Form	
Form Designation: LP	RRP-01	-Summary Form		Date: 9/2/2008
Weather Conditions:	Affec	t Sample Quality:	Air Temp (F):	24-Hour precipitation:
AM: CHEAR	Yes No (if yes, describe in problems section.)  Min: 7030F  Max: 8030F			
PM: CHEPRE	Yes (if yes	:	Water Temp (F):	Amount (in):
Name:  Doughes Auto  Peviations from USEPA		STEVE OF	2NM-SV-1 - 00   FADO TO SV-00   AVSTAL - E-158- ZERL - E-158-	Other personnel conducting oversight/official visitors:
Core collection activitie Reported: Cores:	es: Total B	# Observed/Repoi lanksAban	rted: / doned Other	
Reported: Cores:	es: Total B	# Observed/ReportanksAban Tube Material Type/Length	doned Other	y Description (%) and
SI Core ID#	В	lanksAban Tube Material	doned Other Recover Disposit	y Description (%) and ion
SI Core ID#	B	Tube Material Type/Length	doned Other Recover Disposit	y Description (%) and
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SI Core ID#	B	Tube Material Type/Length  Leyard - 101  Leyard - 101  Leyard - 101	Recover Disposit	y Description (%) and ion  Ecokago, Mandonco  White, Force Promise, Lotter, Force Promise, Lotter, Lotter, Force Promise, Lotter, Lotter, Force Promise, Lotter, Lotter, Force Promise, Lotter, Lo
Core collection activitie # Reported: Cores:  ESI Core ID #  Loog-ciff 1070	B	Tube Material Type/Length  Leyard - 101  Leyard - 101  Leyard - 101	doned Other  Recover Disposit  0% 2  5.11 26  8.21 26	y Description (%) and ion  Cokaso, Manconso  Cokaso, Fore Prancis  Lokaso, Fore Prancis
FSI Core ID #	B	Tube Material Type/Length  Leyard - 101  Leyard - 101  Leyard - 101	doned Other  Recover Disposit  0% 2  5.11 26  8.21 26	y Description (%) and ion  Cokago, Mangares  Cokago, Fore Pranco

# LPRRP 01-Daily Oversight Summary Form Total # of pages submitted \_\_\_\_\_

# Reported: Cores:	Blanks Abandoned	Other
		· AUTHTES PERFORMED
TSI Core ID #	TSI Sample ID #	Comments/Analyses
		Commence Artery 303
econtamination nativities - "	Total Hoborous 17 1	
ccontainmation activities:	Total # observed Lab:T	otal # observed Boat:
plit sample activity commen	ıt:	
1 000		
oblems encountered/solutio	ns implemented (if necessary):	
1-40-16-1-1-12-12-12-12-12-12-12-12-12-12-12-12		
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fety concerns/issues (if any)		

# LPRRP 01-Daily Oversight Summary Form Total # of pages submitted

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Miscellaneous commen	ts:		
soonanoous commen	L).		
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**************************************			
Core/grab collection	Field activities observed	Total number of	Lab activities observed by
tasks completed by	by government oversight	cores/grabs processed	government oversight
CPG:	personnel:	by CPG:	personnel:
Cores:4	Cores:	Cores:	Cores:
Van Veens/Grabs: 12	Van Veens/Grabs: / 🌶	Van Veens/Grabs:	Van Veens/Grabs:
Abandoned: 12	Abandoned:	Blanks:	Blanks:
Blanks:	Blanks:	Samples shipped:	Decon Activities:
Decons:	Decons: -	FFT	Splits Taken:
			ps ranon.
Malcolm Pirnie Inc Field	Representative Signature:		***************************************
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	JANA AKAN		
Printed Name:	A.		
TAN	and American		T HARD
	- 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1		

Passaic River Study Area C Remedial Investigation Sedimer	
CORE SAME	PLING
Sediment Core Designation: Target Sediment Core	* /
2008 - CLRC - 070 Northing: 72 4358 Easting: 59594	9/2/2008 Time: 0815
Name(s) of Contractor Samplers (Include Boat Captain  PAVE FONIAUSKI CAPTA)  STEVE GADOMSKI COMMES 3 031	Name): MILLE HANGE & ENSP JEFF HOLZER & ENSP JON WALKER
Necessary information (specified in core collection SOI recorded into the field notebook:  Yes No (comment:)	Sampling locations agree with those specified in the QAPP/FSP:  Yes No
Core advanced via:  Pushing (piston/hand)  Other (comment):	Was the core tubing rinsed thoroughly between attempts?  Yes No n/a
Was the vibracore motor turned on immediately after the core tube penetrated the sediment?  Yes No	Was a core catcher used? If so, why?  Yes No  No  CPG
Were multiple attempts made to advance the core?  Yes No Comment:	Was a short core collected? Yes No
	Short Core Designation: 63  Northing: 72-4351.80  Easting: 595937.79  Offset from Target: 6.32

Malcolm Pirnie Inc Oversight Staff's Name (printed):	
Douglas Auro	
Oversight Staff's Signature	Date:
	9/2/2008

Tota	#	of	pages:	
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Action of the second of the se	Pass Remedia	aic River Study / I Investigation S	Area C edimer	PG Ove	ersight oling ar	Project 1d Analysis				
Account of the second of the second			SAMP	LING						
Sedime	ent Grab Designation	i: Target Sedim	ient Gra	ib Locat	ion:	Date:				
200	2008-CLEL-070 Northing: 73.43.50 9/2/2008									
Northing: 724353.10 Time: Easting: 595944.00										
25.6	S) of Contractor Sam C KOMMSKI WE GAOOMS	2021			OF MILES	te House > Ensir				
Necessa	ary information (spec	cified in grab colle	ction S(	OP)	Sampl	ing locations agree with				
Yes	d into the field noteb				those	specified in the QAPP/FSP?				
res	No (comment	:)			Yes	No				
Identify	the type of grab san	npler used (e.g., po	nar dred	lge van	Veen co	ampler, or box corer):				
Jan Brand	MONDEROLA	1/			ender 20	ampier, or box corer):				
Wasathe	campler rincad prop	- W [ 3   AB		( (Skinder )	PATY	- & MC49HTS				
Yes	sampler rinsed prop No n/a		ple grai	b attemp	ots at the	e same location?				
	tempt Chart	Comment:		~~~						
	compe chart									
TSI Gra	b ID #:									
Gra			9	(i) (ii)	<b>/</b> )					
Grab Attempts		Tilde to de marco (Addo)	Offset (fi	(grab/field blank)		Disp				
tten		American Apply	(fi	field	ਰ <b>ੋ</b> ਜੋ	osit				
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	:	100	***	link)		of.				
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	No. wells I				1 5	Other Observations				
	Northing	Easting	<u></u>	<u> </u>		* Other Observations				
41	72A3A7.81	595932.55	2.90	Grigary	A	PERS				
42	724352.10	595932.42	D.B	6,800	A	743845				
43.			epentinus		A	IT-IM-				
Final										
	on: R-Relocation/A-	Abandanadis IV.								
	S-Save until com	plete/F-Final Save	d d							

## LPRRP-03b-Grab Sampling

Total # of pages:
Confirm grab sample labeling and handling by checking appropriate boxes below:  Top 1-inch layer removed for Be-7 analysis  Remaining sample homogenized
VOC collected Sample jars stored on ice
Deviations/Comments: A TOTAL OF WATERIAND WERE
Correct decontamination procedures performed for field equipment (if applicable):
Proper decontamination solutions used  Decontamination waste collected for proper disposal
Additional comments on sampling operations (if necessary):
Malcolm Pirnie Inc Oversight Staff's Name (printed):
TOKENS AND,
Oversight Staff's Signature Date:
712/2008

Total # of pages:

	Area CPG Oversight Project
Remedial Investigation S	Sediment Sampling and Analysis
COR	E SAMPLING
Sediment Core Designation: Target Sedime	ent Core Location: Date:
2008 - CLAL- 078 Northing: 73 Easting: 59	LO 9000-00
Name(s) of Contractor Samplers (Include Boat  PANEL GARDONSKI- MATE)	Captain Name): MIKE HOUSER & ENSE
Necessary information (specified in core collectorecorded into the field notebook:  Yes  No (comment:)	tion SOP) Sampling locations agree with those specified in the QAPP/FSP:  Yes No
Core advanced via: Pushing (piston/hand)  Other (comment):	Was the core tubing rinsed thoroughly between attempts?  Yes No Wa
Was the vibracore motor turned on immediately core tube penetrated the sediment?  Wes No	Was score catcher used? If so, why? Yes No No People BY
Were multiple attempts made to advance the cor Yes No Comment:	Vac No
	Northing:
	Easting:
	Offset from Target:

Total #	of pages:									
Core At	tempt Chart	ger Market Makeyer (1994) dan depagan para dan dan dapapan per lair antamatay ya saga <u>an dan dan da</u>			Pair anna mhaireaga ag cao can a tha a degree an ca				**************************************	····
TSI Cor	e ID #:									
Core Attempts	Northing	Easting	Offset (ft)	Tube Diameter (in)	Sample Type (core/ grab/field blank)	Tube Material	Penetration Depth	Recovery Depth	Recovery %	Disposition of attempt*
<u> </u>	732962.98	596799.89	Application of the control of the co	35/8		Ž	8-5	8-0	94	
Final										***************************************
*Disposi	tion: R-Relocation/A- S-Save until com	-Abandoned/D-Di nplete/F-Final Sav	spose	d/					LL	
Core L	core labeling and han	dling by checking Sealed	appr	opriate	boxes bel	ow:				Market and the second s
Deviation	18:							d, under	tarp)	
Proper	econtamination proce decontamination soluti	ons used T Dec	contan	nination	oment (if waste coll	appli ectec	cable): I for pro	per disp	osal	
Additiona	I comments on sample  4' BLACK  4' BLACK	ing operations (if	neces	ssary): W/T	Sa. C.	<b>2</b> 470	A. es	2.4.4.O	**************************************	
falcolm P	irnie Inc Oversight St	taff's Name (print	ed):							— O do fermino a mass a mayano,
lversight S	Staff's Signature	led			Date:			ð		
	A STATE OF THE STA									

### Passaic River Study Area CPG Oversight Project Remedial Investigation Sediment Sampling and Analysis Daily Oversight Summary Form Form Designation: LPRRP-01-Summary Form Date: 9/3/2008 Weather Conditions: 24-Hour precipitation: Affect Sample Quality: | Air Temp (F): Min: 17505 AM: Start: T Yes CIEAR à AIA Max: 1 84°F (if yes, describe in COOL End: problems section.) PM: Water Temp (F): CHEMIL Ves V 750F Amount (in): (if yes, describe in WATER problems section.) Oversight Staff Assignments: Other personnel conducting Name: Team/Activity Observed: oversight/official visitors: JOHN BUFF MIKE HANGE - ENEC Coentina DO- WALKE - ENDE STEWEL CARRIED SW -ON CANC CARODYSELL - COI Deviations from USEPA-approved work plans: \ GERS SAMPLES UNABLE TO THE CONCERTED AT LOCATION 2008-CUPL-050 AND 2008-CUPL DUE TO DEPOSE & TRASITY Core collection activities: Total # Observed/Reported: # Reported: Cores: Blanks /// Abandoned /// Other TSI Core ID# Tube Material Recovery Description (%) and Type/Length Disposition 3.41 (1980/0) COME TETAMED 3.601 LANAN COLL PETAMENT į ( CORT PHYNICA

## LPRRP 01-Daily Oversight Summary Form Total # of pages submitted \_Z of ||

# Renorted: Cores:	ities: Total # Observed/Reported: BlanksAbandoned	Other
Split sampling activities:	40 SPATSAMPHAGE	reformed on Versey.
TSI Core ID #	TSI Sample ID #	Comments/Analyses
Decontamination activities:	Total # observed Lab:T	Fotal # observed Boat:
Split sample activity commer	nt:	
UNATONE TO CE THE GRAP JAM ACCOMPTS FAMILY	to to obtain A	not food only of h again sangul h acceptable volunce
*		
W	· · · · · · · · · · · · · · · · · · ·	
North HOTER		
dditional observations/comn vents conducted):	nents (if necessary. Include a des	scription of any water column sampling
	///	***************************************

## LPRRP 01-Daily Oversight Summary Form Total # of pages submitted 3 of 11

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	Additional Control of the Control of		
Miscallanaous commants			
Wiscenaneous comments	•		
////AAA/AAAA			
	7		
Core/grab collection	Field activities observed	Total number of	Lab activities observed by
tasks completed by	by government oversight	cores/grabs processed	government oversight
CPG:	personnel:	by CPG:	personnel:
Cores: 5	Cores: 5	Cores: 5	Cores:
Van Veens/Grabs: 12	Van Veens/Grabs: 12	Van Veens/Grabs:	Van Veens/Grabs:
Abandoned: 12 cpens	Abandoned: 12 Gens	Blanks:	Blanks:
Blanks: 🛶 🧳	Blanks: ♣\♠	Samples shipped: 🗲	Decon Activities:
Decons:	Decons: 🙏	CORES GLATTO	Splits Taken:
energianismos		FROMESANG FARILY	•
Malcoln Pirnie Inc Field	Representative Signature:		L
	MI Mal		
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Printed Name:		***************************************	
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Total # of pages: 4 of 1

	c River Study Area CPG O rvestigation Sediment Sar		
	CORE SAMPLING	•	g and rularyous
Sediment Core Designation:	Target Sediment Core Locat		Date:
2008-024-050	Northing: 708818.00 Easting: 589357.00		7/3/2008 Time:
Name(s) of Contractor Samplers  ON CONTRACTOR SAMPLES  STONE GADONSIA (M.	(Include Boat Captain Name	e): ج	THE HOLDER & ENSE
Necessary information (specific recorded into the field notebook Yes No (comment:)	d in core collection SOP)	Sam spec	pling locations agree with those iffed in the QAPP/FSP:
Core advanced via:  Pushing (piston/hand)  Other (comment):	oracore	betw	the core tubing rinsed thoroughly reen attempts?
Was the vibracore motor turned core tube penetrated the sedimer Yes No	•	ALL	a core catcher used? If so, why?  es No ALL CORES  CONSIDERED TO SELL  WILLIAM TO THE OF
Were multiple artempts made to Yes No Comment:	advance the core?		a short core collected?
		Short	t Core Designation: 62
		North	ning: 70 8818-48
		Easti	<sup>ng:</sup> 589357.88
		Offse	t from Target: 1.0

Core Attempt Chart										
TSI Core ID#: 2003-6426-050										
Core Attempts	Northing	Easting	Offset (ft)	Tube Diameter (in)	Sample Type (core/ grab/field blank)	Tube Material	Penetration Depth (in)	Recovery Depth (in)	Recovery %	Disposition of attempt*
<u> </u>	708814.87	589359.0	3.72	35/q,	6000-	X	3.60	3.6	(00	garantin Garanti
L 2-	708818 -48	589357.88	1.60	35/g	CARE	Ę	3.5	2.8	84	(m)
C3	708822.50	58935 84	A. We	35/s	Carto William	2	3.2	2.80	37	Section 1
Final										
*Disposit	ion: R-Relocation/A	-Abandoned/D-D mplete/F-Final Sav	2	:d/	* • • • • • • • • • • • • • • • • • • •		*			
20	core labeling and ha	adling by checking	appr	-		A MARKET			<del></del>	
Core Labeled Core Sealed Marked with "Up" Stored (iced, under tarp)  Deviations: None Note:										
			0 0	11						***
Correct decontamination procedures performed for field equipment (if applicable):  Proper decontamination solutions used  Decontamination waste collected for proper disposal										
	l comments on sam		***********			PP 07 m00 m00 or 0 m00 m0			*	
Chi 3.5 - TIPLE BUT K SANCE										
O.A! - DISCHED, EED/BON SAND & GENTER.										
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Oversight	Staff's Signature	, , , , , , , , , , , , , , , , , , ,			Dat	e:				
						91	3/200	5		
	A Service of the serv			*******************						

Total # of pages: 6 of 1]

	Remedial	Investigation Sec	diment (	Samp	ling and	Analysis
			SAMPLI	NG		
Sediment Grab Designation: Target Sediment Grab Location: Date:						
2008 - CLEC-050 Northing: 7088 8.00 Time:					<u>9/3/2008</u>	
Easting: 589367.00						
Namers	s) of Contractor Samp	olers (Include Boat	Cantain	Name	) resider	0910
FAVE	- Kommski Cci	WALL DAGE		, tarre,	- JOH W	MANA SECTION
STE	16 400M 5K4 6		4' . COI		JEG-F	MONERAL V
	ary information (spec d into the field notebo		tion SOI	1)		g locations agree with cified in the QAPP/FS
Yes	No (comment:)			1	Yes	
				1		
	the type of grab sam					
FS	AC TREDY	- wi/ ather	LAZATI	on I	tanar (	er in
Wasaho	sampler rinsed prope	erly between multi	ple grab	attemp	ots at the s	ame location?
√Yes	No n/a	Comment:				
Grab A	ttempt Chart					
FSI Gra	ıb ID #:					
	ib ID #:			(m)	×	
	ab ID #:		Offset	(grab/	Disp	
	ab ID #:		Offset (ft)	(grab/field	Disposit	
FSI Grab Attempts	ab ID #:		Offset (ft)	(grab/field bla	Disposition Sample Type	
	ab ID #:		Offset (ft)	(grab/field blank)	Disposition of a	
	ab ID #:		Offset (ft)	(grab/field blank)	Disposition of attem	
		Facting	Offset (fi)	(grab/field blank)	Disposition of attempt*  Sample Type	Other Observations
	Northing	Easting	Offset (ft)	(grab/field blank)	Disposition of attempt*	Other Observations
Grab Attempts				(grab/field blank)	Disposition of attempt*  A  Sample Type	Other Observations
Grab Attempts	Northing 708814-37	5893563	2.74	(grab/ñeld blank)	of attempt*	Other Observations
Grab Attempts	Northing	5893563	2.74	(grab/field blank)	of attempt*	Other Observations
Grab Attempts	Northing 708814.37 708812.06	589357.54	3-17	(grab/field blank)	of attempt*	Other Observations
Grab Attempts	Northing 708814.37 708812.06 708811.03	589357.54 589361.60	2.75 3.17 4.63	(grab/ñeld blank)	of attempt* A A A	Other Observations
Grab Attempts  Grab Attempts  Final  GA	Northing 708814.37 708812.06 708811.03	589357.54 589361.60 589365-41	2.75 3.17 4.63 7.03	(grab/field blank)	of attempt* A A	Other Observations
Grab Attempts  Grab Attempts  Final  GA	Northing 708814.37 708812.06 708811.03 708813.52 ition: R-Relocation/A	589357-54 589361-60 589365-41 -Abandoned/D-Di	2.74 3.17 4.63 7.03 sposed/	(grab/field blank)	of attempt* A A A	Other Observations
Grab Attempts  Final  Dispos	Northing 708814.37 708812.06 708811.03 708813.52 ition: R-Relocation/A	589361-60 589365-41 -Abandoned/D-Di- nplete/F-Final Sav	2:74 3:17 4:63 7:03 sposed/	(grab/field blank)	of attempt* A A A	Other Observations

## LPRRP-03b-Grab Sampling

Total # of pages: 2 of 11

Confirm grab sample labeling and handling by checking appropriate boxes below:
Top 1-inch layer removed for Be-7 analysis Remaining sample homogenized
VOC collected Sample jars stored on ice
Deviations/Comments:
LO FAILED ATTEMPTS TO CONSECT A GRAD
SAMPLE ATTEMPTS TO COLLECT A GRAD SAMPLE AT 2008 - CHELL OSTO, LOCATION ABANDONSO.
Correct decontamination procedures performed for field equipment (if applicable):
Proper decontamination solutions used Decontamination waste collected for proper disposal
Additional comments on sampling operations (if necessary):
MILL DIVING CO. N
Malcolm Pirnie Inc Oversight Staff's Name (printed):
Daggers Auro
Oversight Staff's Signature, Date:
Delace 9/3/2008
No. of the second secon

Total # of pages: 8 of 1

	c River Study Area CPG O	_	· · ·	
Remedial II	nvestigation Sediment Sar	nplin	g and Analysis	
	CORE SAMPLING	<del>!</del>		
Sediment Core Designation:	Target Sediment Core Location: Date: 9/3/2008			
Z008-CURC-06)	Northing: 718819.00 Easting: 591892.00	Time: 3020		
Name(s) of Contractor Samplers  PANE K OWNERS (CONTRACTOR)  STEWER GADOM SKA CONTRACTOR	s (Include Boat Captain Name	e): 🐣	THE HAUSER SENSE ON WALKER	
Necessary information (specific recorded into the field notebook Yes No (comment:)	d in core collection SOP)	spec	pling locations agree with those iffed in the QAPP/FSP:	
Core advanced via:  Pushing (piston/hand)  Other (comment):	a bracore	betw	the core tubing rinsed thoroughly veen attempts? es No n/a	
Was the vibracore motor turned on immediately after the core tabe penetrated the sediment?  Yes  No		Was a core catcher used? If so, why?  Yes No Location To Have SECTION OF THE INC. IN CORP.  TO RECEIVE Y FAMOUR ATTEMP		
Were multiple attempts made to Yes No Comment: ONLY ONE ATTEMPT FOR EACH CORE ATTEMPT	und held south	Y	a short core collected?  es No VILLE CORE Designation: C2	
		Nort	hing: 718821.78	
		Easti	ng: 5 91 8 92 . 20	
		Offso	et from Target: 2.771	

Total # of pages: 90F 1

Core Atte	empt Chart							······································		
TSI Core	ID#: 20080 - 6		A-17-17-1-24							
Core Attempts	Northing	Easting	Offset (ft)	Tube Diameter (in)	Sample Type (core/ grab/field blank)	Tube Material	Penetration Depth (in)	Recovery Depth (in)	Recovery %	Disposition of attempt*
C3.	718818 - IA	591840.90	5 ٿيا	3 %	20212	T.	Co*	6.4	l sof	Carrick A
CZ	718821.78	591892.20	2.73	3 Yb	10116.	S.	4.5	4.0	92	garan. Agaran
Final										
Confirm Core L  Deviation	*Disposition: R-Relocation/A-Abandoned/D-Disposed/ S-Save until complete/F-Final Saved  Confirm core labeling and handling by checking appropriate boxes below:  Core Labeled Core Sealed Marked with "Up" Stored (iced, under tarp)  Deviations: Home Notes									
	econtamination procedecontamination solut				pment (if waste co				oosal	
Additiona	I comments on samp	ling operations (if	nece	ssary):		~				
CIT COST CATURED THE ZOOD.  A' BLACK SILT & SAND  2.7'- DED/BROWN SAND  0.5'- DECARD SAND & GRAPEL										
C2 - CARR CATCHER VILLERY  A1 - PARICE SIST & SAND  1. U' - PRO   SEAND SAND  0.4' DISCARD, RO   ORD SAND										
Malcolm I	Pirnie Inc Oversight	Staff's Name (prir	ited):		1 1/	12.0	war, i	<u> </u>	نڙ ≻∗:	ment ()
	ugens Aux	<u> </u>			· · · · · · · · · · · · · · · · · · ·					~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~
Oversight	Staff's Signature	Lee			Dat		3/2	-00 S		

Total # of pages: 10 of 11

Passaic River Study Area CPG Oversight Project Remedial Investigation Sediment Sampling and Analysis							
-		GRAB	SAMPL	ING			
Sedimen	t Grab Designation:	Target Sedime	ent Grab	Location	n: Date	à 26	
	- CIRC- 061	Northing: 718819.00 Time: Easting: 591892.00					
MANC.	of Contractor Sample - KONNUEL - 0	<b>7</b> !	Captain	Name):	MIKE	- HAUSER - ENSER HOWERE - ENSER NAME - ENSER	
Necessary information (specified in grab collection SOP) recorded into the field notebooks:  Yes No (comment:)  Sampling locations agree with those specified in the QAPP/FSP?  Yes No							
Was the	he type of grab sample proper sampler rinsed proper	N/ STABILIZ	Mion	FIN	rt i	+ WEATHS	
Yes	//////////////////////////////////////	Comment:	181141 m <sup>1</sup> 10 100 m 10 10 m 10 10 m 10 m 10 m 10				
Grab Atte	empt Chart						
TSI Grab	ID #:						
Grab Attempts		ad to administrative or commission of the commis	Offset (ft)	Sample Type (grab/field blank)	Disposition of attempt*		
	Northing	Easting	A-1		* 1	Other Observations	
44	NAME OF THE PROPERTY OF	advantage de la companya de la comp		9840	A		
Colle	and the second second	99999665	3297×	Gara	A		
43		шарандагайну	wowokus	C+1748	A		
Final	parameter de	Notice of the Control	600.000	G816	A		
*Disposit	ion: R-Relocation/A-7 S-Save until com		•				
15	Sessesses	seemas	****	7000	A		
F Le	and the second s		carren e	48MD	P		

### LPRRP-03b-Grab Sampling

Total # of pages: 1 of 1
Confirm grab sample labeling and handling by checking appropriate boxes below:  Top 1-inch layer removed for Be-7 analysis  Remaining sample homogenized
VOC collected Sample jars stored on ice
Deviations/Comments: No SAMPLE COLLEGED AFTER LO FINALD ATTEMPTS. SEAMCHTS WHERE MOSTLY LEAF DEEDERS, STICKES & TRANSIT.
Correct decontamination procedures performed for field equipment (if applicable):  Proper decontamination solutions used  Decontamination waste collected for proper disposal
Additional comments on sampling operations (if necessary):
Malcolm Pirnie Inc Oversight Staff's Name (printed):
Pougras Aug.
Oversight Staff's Signature Date:
4 - 13 200 8

#### Passaic River Study Area CPG Oversight Project Remedial Investigation Sediment Sampling and Analysis **Daily Oversight Summary Form** Form Designation: LPRRP-01-Summary Form Date: 9/4/2008 Weather Conditions: Affect Sample Quality: | Air Temp (F): 24-Hour precipitation: Min: ~ 78 0F CHEAT & Yes Start: Max: 860F (if yes, describe in problems section.) End: Water Temp (F): Yes WHEM ∨75°F Amount (in): (if ves. describe in problems section.) Oversight Staff Assignments: Other personnel conducting Name: Team/Activity Observed: oversight/official visitors: DOIGHAS AUNO DAKE-KAWAREKA - OS) JOHN 2014 E-JAY DELOGRADOSI DEMANINS MIKE HARRY - FUSE 1865- HOLZER-EUSE Deviations from USEPA-approved work plans: Core collection activities: Total # Observed/Reported: # Reported: Cores: Blanks Abandoned Other TSI Core ID # Tube Material Recovery Description (%) and Type/Length Disposition 2008-026-068-CI HEVAN-101 CORE PERMINE FOL 7100-150 60 2008-4-RC-069-61 LOXAN-10" 11-02 1-540-101

# LPRRP 01-Daily Oversight Summary Form Total # of pages submitted 2004

# Reported: Cores: B	s: Total # Observed/Reported	1:
:		
Split sampling activities: 40	501 545 VANG	Preformer?
TSI Core ID #	TSI Sample ID #	Comments/Analyses
		Total # observed Boat:
Safety concerns/issues (if any):	SHEET SPIT SAR OR YOU AHAYSIS SHEETED BE CAU OFFICE SA COLOR.	SPA DE A GRAST SE CRETURS UNASIA MPLANTEMENT
mare marea		
	**************************************	
	ртурунан шана такжуулу, ушша шауучуу шаша шаруул шашаша такжуу турун такжуу уу шаш	
3.35.5		
additional observations/comments	(if necessary, Include a desc	ription of any water column sampling
rents conducted):		

## LPRRP 01-Daily Oversight Summary Form Total # of pages submitted

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	A T		
			-
		**************************************	
		······································	
Miscellaneous comments			
Core/grab collection	Field activities observed	Total number of	Lab activities observed by
tasks completed by	by government oversight	cores/grabs processed	government oversight
CPG: 2.5	personnel:	by CPG:	personnel:
Cores:	Cores:	Cores:	Cores:
Van Veens/Grabs: 12	Van Veens/Grahs: 179	Van Veens/Grabs:	Van Veens/Grabs:
Abandoned: (2 400)	Abandoned: 12 4455		Blanks:
Blanks:	Blanks:	Samples shipped:	Decon Activities:
Decons:	Decons:	sumpres simppes.	Splits Taken:
			Spitts rakeit.
Malcolm Pinnie Inc Field	Representative Monature		
Serving.		A. A	
Printed Name:	A STATE OF THE STA		
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	12 10147		***************************************

Total # of pages:

Passa	ic River Study Area CPG (	Oversight Project
Remedial I	nvestigation Sediment Sa	mnling and Analysis
***************************************	J	mping and Analysis
	CORE SAMPLING	
Sediment Core Designation:	Target Sediment Core Loca	tion: Date:
700 - 71-01-3		9/4/2008
2008-6126-068	Northing: 724016.00	9 4 2008 Time: 0820
Name(s) of Contractor Sampler	Easting: 595000.00	
DAVE YOUALSY LON	s (include Boat Captain Nam	e): MIKE HAUSER
JAY DELOCALZOLA	7051	C): MIKE HAUSER > ES+52
Necessary information (specifie	d in core collection SOP)	***
recorded into the field notebook	:	Sampling locations agree with those specified in the QAPP/FSP:
Yes No (comment:)		Yes No
		140
Core advanced via:	**************************************	Was the core tubing rinsed thoroughly
Pushing (piston/hand) Wit	racore	between attempts?
Other (comment):		Yes No n/a
,		CHEY I ATTEMPT PLY
		cor welly self.
Was the vibracore motor turned	on immediately after the	Was a core catcher used? If so, why?
core tube penetrated the sedimen	t?	Yes No
Yes No		NO PEASON PROJOCO ES
		UPG.
Were multiple attempts made to a	advance the cora?	Ň.
Yes No Comment:	idvance the core;	Was a short core collected?  Yes No
Comment:		Yes No
		Short Core Designation: CZ
		Construct factors
		Northing: 724014.71
		Fasting COLOGO 9 1
	į	Easting: 594998-34
	t man and a second seco	Offset from Target:
	*** III III II II II II II II II II II I	

Total # of pages: 5059

Core At	tempt Chart		<del></del>		****					
TSI Cor	e ID#: <u>Zoo 8 -</u>	<u> </u>	i i							
Core Attempts	Northing	Easting	Offset (ft)	Tube Diameter (in)	Sample Type (core/ grab/field blank)	Tube Material	Penetration Depth (in)	Recovery Depth (in)	Recovery %	Disposition of attempt*
61	7240 4.70	5950m;34	1.34	37/8	5-081;	Ž	9.5	9,6	101	-
<i>C</i> 2.	724014.71	594998.34	2,10	373	CIV	2	9.5	8-7	4:	Faces .
Final	ion: R-Relocation/A					VIII			TO THE PARTY OF TH	
✓ Core L Deviation	core labeling and ban abeled Core s: Hote Ho	Sealed N	appro larked	l with "U	p" •	Sto	red (ice	d, under	tarp)	
Proper	econtamination procedecontamination solut	ions used T Dec	contan	nination	waste col	appli lected	cable): I for pro	per disp	osal	
<b>-vauntona</b>	I comments on samp	ling operations (if	neces	ssary):						
	irnie Inc Oversight S	itaff's Name (prim	led):		A			P P Table 1 P 1 married 1		
versight S	Staff's Signature				Date	9	4/200	· B		

Total # of pages: 60 0 9

*		-	edimen	PG Over t Sampl	ing and	Analysis
			SAMP			
	ent Grab Designation				on: Da	9
Zd	38 ~ CUIL - 00	8 Northing: 72	A01/0	. 00	Ti.	9/4/2008
		Easting:	5000	7.00		ne.
Name(	s) of Contractor Sam	plers (Include Boa	t Captai	n Name)		
	TELOREN LO	3001			1-116-6	-HMSERZ Zers
Necess	ary information (spe	cified in grab collec	ction SC	)P)		Howeve ) g locations agree with
recorde Yes	ed into the field notel	ooks:			those spe	cified in the QAPP/FSI
* Yes	No (comment	:)			Yes	No
Identify	the type of grab san	ıpler used (e.g., po	nar drec	lge, van v	/een sam	pler, or box corer):
	WALL DECKNE	į.				
Waszh	sampler rinsed prop	erly between multi	ple grat	attempt	s at the s	ame location?
Yes	No n/a	Comment:		<b>1</b>		mile toution.
Grab A	ttempt Chart	Arthur				
l'SI Gra	b ID#:					
Gra			Qf	Sa (@		
<b>Б</b> А		1				
		To Miller (AA)	se i	ab/fi	)ispo	
ttemp			Offset (ft)	mple Typ	Dispositic	
Grab Attempts			šet (ft)	Sample Type (grab/field blant	Disposition of	
ttempts			šet (ft)	grab/field blank)	Disposition of atte	
ttempts			set (ft)	mple Type ab/field blank)	Disposition of attempt	
ltempts	Northing	Easting	set (ft)	mple Type ab/field blank)	Disposition of attempt*	Other Observations
THE STATE OF THE S	Northing 72-4016-04		***************************************	ank)		Other Observations
q in		59500.58	3.30	ank)		Other Observations
92 92	724018.35	59500.58 595000.57	7.49	GRAS GRAS	A	Other Observations
42	724018.85 724018.56	59500.58 59500.57 59500541	7.49	ank)  GRAS  GRAS	A A A	SATEMA COLEGIS
72- 72- 73- 71- 74	724018.85 724018.56 724012.56 724009-18	59500.58 595000.57 59500541 595003.18	7.49 5.5 6.21	ank)  GRAS  GRAS	A A A	

### LPRRP-03b-Grab Sampling

Total # of pages: 7 of
Confirm grab sample labeling and handling by checking appropriate boxes below:  Top 1-inch layer removed for Be-7 analysis  Remaining sample homogenized
VOC collected Sample jars stored on ice
Deviations/Comments: Co GRAS AFTEMPTS NECESSARY TO OBJANT MOREQUETE SATPLE.
Correct decontamination procedures performed for field equipment (if applicable):
Proper decontamination solutions used Decontamination waste collected for proper disposal Decont of Property BETWEET CORNERS
Additional comments on sampling operations (if necessary):
Malcolm Pirnie Inc Oversight Staff's Name (printed):
Dovaras Aus
Oversight Staff's Signature Date:
A LL LLC 9/4/2008
AND THE PROPERTY OF THE PROPER

Total # of pages:

Passai Remedial I	c River Study Area CPG nvestigation Sediment S	Oversight Promote and a	oject Analysis
	CORE SAMPLIN		
Sediment Core Designation:	Target Sediment Core Loc		0/4/2 no 2
2008 - 022-069	Northing: 59584 . 8 Easting: 724486 . 4	7 . [	1310
Name(s) of Contractor Sampler  TAY DELOCATOR	s (Include Boat Captain Nan	e): MIKE	HOWSER 3 EMSR
Necessary information (specific recorded into the field notebook Yes No (comment:)	d in core collection SOP)	Sampling lo	ocations agree with those the QAPP/FSP:
Core advanced via:  Pushing (piston/hand)   Vit  Other (comment):	pracore	Was the corbetween atte	e tubing rinsed thoroughly empts?  No n/a
Was the vibracore motor turned core tube penetrated the sedimen  Yes No	on immediately after the t?	Was a core o	eatcher used? If so, why? No
Were multiple attempts made to a Yes No Comment: OHLY ONE ATTEMPT FOR EACH CORE ATTE	NECES SHOW	Yes Dyplacent	core collected? No esignation:
	1	Northing: 72	24484.11
	:	Easting: 59	15819.78
	:	Offset from Ta	arget: 0.791
	years of the second	anne per promote de la company de la proposition de la company de la com	

Total # of pa	ges: <u>9</u>	of	
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_	e ID#: <u>Z008 - C</u>	Mha Ogh		<b>.</b>	Jorga (a		*		Ī	Tax -
Core Attempts	Northing		Offset (ft)	Tube Diameter	Sample Type (core/ grab/field blank)	Tube Material	Penetration Deptl	Recovery Depth	Recovery %	Disposition of attempt*
and the		Easting	Anthron Cale			T.	7			
Sant Sant	724486.42	59584.83	5-72	3%	602E2	Š	7.0	7.60	jøð	- Common
L. Z.	724984-11	595819.78	0.77	398	COUL	K.	7.0	7.3	100	facility facility
Final			110000000000000000000000000000000000000					A III		
Disposit	ion: R-Relocation/A	-Abandoned/D-Di	ispose	d/				*******		
	s-save until con	nplete/F-Final Sav	red –							
antim o	ore laboling and	117 1 1 1 1		<del></del>						
ontirm c	ore labeling and han	dling by checking	appr	opriate l	boxes bel	OW:	*			
Oprirm of Core La	ore labeling and han	dling by checking	appr	opriate I I with "L	boxes bel	100		d under	tarn)	
Core Li eviation:	core labeling and han abeled Core !	dling by checking	appr	opriate I I with ''U	boxes bel p" *	100		d, under	tarp)	
Core Li eviation	core labeling and han abeled Core s	dling by checking Sealed N	approfarked	l with "U	√p" *	Sto.	red (ice		tarp)	***************************************
Core Li eviation: orrect de	core labeling and han abeled Core! s:	dling by checking Sealed N dures performed 1	approfarked	l with "U	√p" *	Sto.	red (ice		tarp)	
Core Li eviation: orrect de	core labeling and han abeled Core! s:	dling by checking Sealed N dures performed t	approfarked	l with "U	oment (if	Sto.	red (ice		***************************************	
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#### Passaic River Study Area CPG Oversight Project Remedial Investigation Sediment Sampling and Analysis Daily Oversight Summary Form Form Designation: LPRRP-01-Summary Form Date: 9/8/2008 Weather Conditions: Affect Sample Quality: | Air Temp (F): 24-Hour precipitation: AM: Min: V GSOF Start: < AIA SHOTH BREEZE = Yes Max: レ 809 (if yes, describe in End: problems section.) Water Temp (F): LIENZ & WARM Yes No V750F Amount (in): (if ves. describe in problems section.) Oversight Staff Assignments: Other personnel conducting Name: Team/Activity Observed: oversight/official visitors: TORA ZOLER Since Grownshires JOHN WETMER - CON DEMAXIME MIKE HAUSER- BUSE JEFF HOLZER CHOIC Deviations from USEPA-approved work plans: Comes Vesser Personal Colors LOCATION 076 50015 OFTENHALT WOOFTON AFTER 3 FALLOW MICHAELS TO GET AN ACCOUNT COLD AT TABLET LOCATION. Core collection activities: Total # Observed/Reported: # Reported: Cores: 5 Blanks Abandoned Other NO GRAS SAMPLE CONTEXTION DESCRISO. TSI Core ID# Tube Material Recovery Description (%) and Type/Length Disposition 2008-CUEL-076 Cal LEXAL- 161 INAUEQUAE TELL ( Lexus - W LEXANI - 6 VERSON PELICIPIED 300150 OF THREET LENAN - 61 I-CHALL - 6

# LPRRP 01-Daily Oversight Summary Form Total # of pages submitted \_\_Z\_of\_7

Split sample collection activities:	Total # Observed/Reported:	/
# Reported: Cores: Blar	nksAbandoned	Other
Split sampling activities: 🔥		
Decontamination activities: Total	# observed Lab· Tot	al # observed Root:
Split sample activity comment:		
AT DESO. TEHNE YOU FULL.  VINABLE TO DESFORM  ACT MITTIES BECAUSE  VESSEL.	OUT OF FUNCE F	SI VERNORE GENERATOR
Safety concerns/issues (if any):		
Additional observations/comments ( events conducted):  Condic Activities to  Ve 3500, The " Williams	(if necessary, Include a descri	ption of any water column sampling  A STALLE COL
TENDER BATE PHOESE TO FERRY CARREST PROGRESSION OF FACILITY	TERMINALAND  JELL TO DOUG S	FBM SETTANOIS  LEANCE GREWG SITES  TRANSPORT TO

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N 4:!!			
Miscellaneous comments	S:		
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Caralanahaallastia	You I I do not be a little of the little of	FPA .	3
Core/grab collection	Field activities observed	Total number of	Lab activities observed by
tasks completed by CPG:	by government oversight	cores/grabs processed	government oversight
Cores:	personnel:	by CPG:	personnel:
Van Veens/Grabs:	Cores: 5	Cores:	Cores:
Abandoned:	Van Veens/Grabs:	Van Veens/Grabs:	Van Veens/Grabs:
Blanks:	Abandoned: 3	Blanks:	Blanks:
Decons:	Blanks: AIA	Samples shipped:	Decon Activities:
Decons:	Decons: 📣	477	Splits Taken:
Malaalm Divers In F' 11	D		
Malcolli Funie inc Field	Representative Signature;		
No. of the contract of the con	WAND		
Printed Name:	okha U. L. La		
rrinted Name:	A		
	us Aug		

Total # of pages: 4 of 7

entreference (Application performance)	Passaic River Study Area CPG Oversight Project Remedial Investigation Sediment Sampling and Analysis						
	CORE SAMPLING						
Sec	Sediment Core Designation: Target Sediment Core Location: Date:						
20	203-CL2C-07LD	   Northing: 731058-0	9/2/2m2				
Nai	me(s) of Contractor Sampler	Easting: 59610.00 s (Include Boat Captain Nar	0908 ne): Must Honor				
25	tene caronsum	-w-3021	JEFF HOLZER JENSE				
reco	ressary information (specifie puted into the field notebook es No (comment:)	d in core collection SOP):	Sampling locations agree with those specified in the QAPP/FSP:  Yes No				
Р	e advanced via: ushing (piston/hand) Vit ther (comment):	pracore	Was the core tubing rinsed thoroughly between attempts?  Yes No n/a				
Ye		t?	Was a core catcher used? If so, why?  Yes No  Ho Person Person BY				
Were Ye	multiple attempts made to a No Comment:	dvance the core?	Was a short core collected? Yes No				
			Short Core Designation:				
			Northing: NA				
			Easting:				
			Offset from Target:				
	Same						

Total # of pages: 5077 Core Attempt Chart TSI Core ID #: Core Attempts Tube Diameter (in) Sample Type (core/ grab/field blank) Offset (ft Tube Material Penetration Depth Recovery % Disposition of Northing Easting Z31058·39 596108.5A 1.51 33/8 731063.82 596106.416.84 35% Carlo 731070. ZLO 596102.77 1423 35/8 Final \*Disposition: R-Relocation/A-Abandoned/D-Disposed/ S-Save until complete/F-Final Saved Confirm core labeling and handling by checking appropriate boxes below: Core Labeled Core Sealed Marked with "Up" Stored (iced, under tarp) Deviations: UNLASIVE TO CONFET USABLE CORE. Correct decontamination procedures performed for field equipment (if applicable): Proper decontamination solutions used 
Decontamination waste collected for proper disposal Additional comments on sampling operations (if necessary): C1, C1 & C3 - MITCHAR IL BUTTOM OF COOK APPRACES TO BE PREDATIVEMENTS SAND & GRANICL. UHABLE TO DETAIL A VENER CORE AT THIS LOCATION, Malcolm Pirnie Inc Oversight Staff's Name (printed): Oversight Staff's Signature

Date:

Total # of pages: \_\_\_\_\_o = 7

Passa	ic River Study Area CPG	Ovorsight Decimal		
Remedial I	nvestigation Sediment Sa	Oversight Project		
	Jana a damient of	mipmig and Analysis		
	CORE SAMPLIN			
Sediment Core Designation:	Target Sediment Core Loca	ntion: Date:		
2008 - CLEC - 0760	Northing: 73/058-00	9/8/2008		
		Time: 0921		
Name(s) of Contractor Sampler	s (Include Boat Captain Nam	e): Marchanaca		
Macaccan in El Appense 1	mm \$ 051	e): MILLS HAUSEDZ } EHSZ		
inecessary information (specifie	d in core collection SOP)	Sampling locations agree with those		
recorded into the field notebook Yes No (comment:)	:	specified in the QAPP/FSP:		
		Yes No		
Core advanced via:		Was the core tubing rinsed thoroughly		
Pushing (piston/hand) Vib	racore	between attempts?		
Other (comment):		Yes No n/a		
Was the vibracore motor turned o	on immediately after the			
core tube penetrated the sediment	?	Was a core catcher used? If so, why? Yes No		
Yes No				
		est cpc.		
Were multiple attempts made to a	dvance the core?	Was a short core collected?		
		Yes No		
AFTER 3 FALLOW AT	10' South	Short Core Designation:		
	TOWNS AT	2008-424-074-C5		
TARYET LOCATION.		2008-414-074-65		
		Northing: 730760.85		
		Easting: 596104,00		
	:			
		Iffset from Target: 297, 24		
	:	,		
	The second secon			

Core At	tempt Chart		······································				·	***************************************		***************************************
TSI Cor	e ID #:									
Core Attempts	Northing	Easting	Offset (ft)	Tube Diameter (in)	Sample Type (core/ grab/field blank)	Tube Material	Penetration Depth	Recovery Depth	Recovery %	Disposition of attempt*
<u> </u>	730757.75	590108.73	30 (. oj	35/8	6026	E.X.	4.0	3.2	තිර	Parties of the Partie
65	7307/00-35	(	:		}	EX.	4.1		119	
Final			THE PART OF THE PA					1100cmmlayyymana		
*Disposit	ion: R-Relocation/A-	·Abandoned/D-Dis	sposed	1/						
Deviations Correct de Proper conditional	Core Labeled Core Sealed Marked with "Up" Stored (iced, under tarp)  Deviations:  Correct decontamination procedures performed for field equipment (if applicable):  Proper decontamination solutions used Decontamination waste collected for proper disposal additional comments on sampling operations (if necessary):									
CATOP VI OF CORE MOTERS TO SE BLACK SMITS AND FOLLOWICO BY THOUSE SAND A GRAVEL TO										
15- COPE CATURE MOMENTARING DECOMES FREE OF CARE  INSE- DURING EXTRACTION ALLOWING FOR SCOMENTIN TUBE TO  WHIFT ARREST, A-LO!! SEDIMENT IT CORE APPROACH TO BE  PREDX. L'OF BLACK SILTY SAND FOLLOWED BY 780/88N  SILTY SAND.										
	theolm Pirmie Inc Oversight Staff's Name (printed):									
2000 ersight Su	AS AUST att's Signature	1 A			Date:	18	£			

#### Passaic River Study Area CPG Oversight Project Remedial Investigation Sediment Sampling and Analysis Daily Oversight Summary Form Form Designation: LPRRP-01-Summary Form Date: 9/11/2008 Weather Conditions: Affect Sample Quality: Air Temp (F): 24-Hour precipitation: AM: ELOVAY & Min: 4 600F MIA7 Start: Yes No £001-Max: > 78°€ (if yes, describe in End: problems section.) Water Temp (F): Yes No VUBOF Amount (in): (if ves, describe in problems section.) Oversight Staff Assignments: Other personnel conducting Name: Team/Activity Observed: oversight/official visitors: JoHN BUFE - DECHMINIS JOHN WETMER - 091 STENE GRADINSKI -03 DHENE ENSE MIKE HAUSSE - ENSE CHEF FIRSTENBELLY JEFF HOLLOC FASE TIPERA SOUTHUS Deviations from USEPA-approved work plans: Location 082 Agandones PRIOR TO OVERSIGHT MARRIAGI AT OSIS BECAUSE ONE PARKLE ON GOT ATGATENY LONG Core collection activities: Total # Observed/Reported: # Reported: Cores: Blanks Abandoned Other TSI Core ID# Tube Material Recovery Description (%) and Type/Length Disposition 5.9 of Revisional 2008-026-083 C1 9' COCK EMERGE 6.0' OF FEMCIEMINI 9 LORGE BREEKL 4.8' ELLOVERY - SOYO 1.8' OF PROVINCEMENT a act back 2008-6426-090 C1 FETANCO PELOVERY WAS THAN I' 9' COURT BARRELL PRECEDENT LICES THAT CORE ABANDONESO 3 4 9 COLL MASIL 11 CA 91 core Breeze ŧ į ZIN IF PELONIET 6.0' of PENERMANDS " 65 ŧ ( 91 LOUGE OMPON

### LPRRP 01-Daily Oversight Summary Form Total # of pages submitted

Split sample collection as	ctivities: Total # Obser	rved/Reported:	/
# Reported: Cores:	Blanks At	oandoned O	ther
Split sampling activities:	NO SOUTH	SKILLES SEACON	men of these
TSI Core ID#	TSI Sample	· ID #	Comments/Analyses
			Commonts: 7 that y 503
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		MATERIAL SAME	
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Decontamination activitie	s: Total # observed L	ab Total	# observed Boat:
Decomandada den vicio	73. TOTAL II OUSELVEA E	i Otal 7	TOUSCIVEU BOAL.
Split cample activity com	mant:		
Split sample activity com	HICHU.		
Duois laure amaguntanalian			
Problems encountered/sol			
THE ON VENS	<u>fee Tim is</u>		BEING USED, THE
"WILLDUIN DOE	LAMP TON EL	POOR FOR	GOVE SHORESIGHT
FREEZEWAKTEL . /	SAREWIT.	ALL OVERS	GHT IS PELFORATED
FROM DEAN	INDER CINI	BOXT. HOW	ENFOR SEAS SATTOLES
			ENORY BOAT TEMOPIE
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			NEVERTINA MENTAL
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Safaty aanaamalisaysa (if	and.		
Safety concerns/issues (if	arry).		
NOME NO			
	V=10-01-01-01-01-01-01-01-01-01-01-01-01-0	#/************************************	
11111 11111 11111 11111 11111 11111 1111			
a 3 4 5 .	4.8		
	imments (if necessary	. Include a descripti	on of any water column sampling
events conducted):		, , , , , , , , , , , , , , , , , , ,	
CAMP SATTLE	> FOOT ZOOP	>- CIRL-090	0.000 000 000 000 0
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Miscellaneous comments	S:		
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Core/grab collection	Field activities observed	Total number of	Lab activities observed by
tasks completed by	by government oversight	cores/grabs processed	government oversight
CPG:	personnel:	by CPG:	personnel:
Cores: 7	Cores: 7	Cores:	Cores:
Cores: 7 Van Veens/Grabs: 5	Van Veens/Grabs:	Van Veens/Grabs:	Van Veens/Grabs:
Abandoned: 3 cores	Abandoned: 3 coses	Blanks:	Blanks:
Blanks: 4- Parke	Blanks:	Samples shipped:	Decon Activities:
Decons:	Decons:	* * *	Splits Taken:
		The second secon	1
Malcolm Pirnie Inc Field	Representative Signature:	<del></del>	
and the second			
Printed Name:			
- conductive glassification	1		
	the Hund		

Total # of pages: 4 of 9

#### Passaic River Study Area CPG Oversight Project Remedial Investigation Sediment Sampling and Analysis **CORE SAMPLING** Sediment Core Designation: Target Sediment Core Location: Date: 2008-CLR-083 Northing: 737973 Time: Easting: 597459 Name(s) of Contractor Samplers (Include Boat Captain Name): MILL HARBIEL JOHN WETTER STENE GARDINGL JEAF HOLIA Necessary information (specified in core collection SOP) Sampling locations agree with those recorded into the field notebook: specified in the QAPP/FSP: Yes No (comment:) Yes No Core advanced via: Was the core tubing rinsed thoroughly between attempts? Vibracore Pushing (piston/hand) Yes No Other (comment): Was the vibracore motor turned on immediately after the Was a core catcher used? If so, why? core tube penetrated the sediment? Yes No Yes No. care earliers have seen USES THEORHOUT PERGENTS Were multiple attempts made to advance the core? Was a short core collected? Yes No Comment: Yes No DUPHLATE Short Core Designation: 2008-446-083-62 Northing: 7379 74.22 Easting: 5 974 01. 60 Offset from Target: HOT VOLOROSCY BY SHOWINGHT

Total # of pages: 5 6 9 Core Attempt Chart TSI Core ID #: (core/ grab/field blank) Core Attempts Offset (ft) attempt\* Tube Diameter Sample Type Tube Material (m) PT Penetration Depth Recovery Depth Recovery % Disposition of Northing Easting 737973.27 A STATE OF THE PARTY OF THE PAR 73 Co Zue Final \*Disposition: R-Relocation/A-Abandoned/D-Disposed/ S-Save until complete/F-Final Saved Confirm core labeling and handling by checking appropriate boxes below: Core Labeled Core Sealed Marked with "Up" Stored (iced, under tarp) Deviations: Correct decontamination procedures performed for field equipment (if applicable): Proper decontamination solutions used Proper decontamination waste collected for proper disposal Additional comments on sampling operations (if necessary): Malcolm Pimie Inc Oversight Staff's Name (printed): Oversight Staff's Signature Date:

Total # of pages: 69

		ic River Study Ard Investigation Sed				
		GRAB S	AMPL	ING		
Sediment Grab Designation: Target Sediment Grab Location: Date:						
2008	2008 - CURC - 083 Northing: 737973 Time: V 0930					
Jami	of Contractor Samp	olers (Include Boat (	aptain	Name)	" MIK	HAUSER ZENEZ
Necessai	ry information (specinto the field noteboxing No (comment:	ooks:	ion SO	P)	-	ng locations agree with pecified in the QAPP/FSP?
Was the Yes	the type of grab sam sampler rinsed prop No n/a empt Chart	- W/ STABLUZ	4∏0-Ì			mpler, or box corer): same location?
TSI Grab	•					
Grab Attempts	48 M. All And Control and Cont		Offset (it)	(grab/field blank)	Sample Type	Other Observations
	Northing	Easting	wagininana		^	A Guier Gosci varions
41	737978.72	597463-08		CHRAG	A	
G2	737979.88	597459-38		GRAD	, 5	BOF COHEUTED
43 Final	737984.24	597458-93		GRAZ	<u> </u>	You conserve
*Disposit	ion: R-Relocation/A	-Abandoned/D-Dis				

### LPRRP-03b-Grab Sampling

Total # of pages: 7 of 9
Confirm grab sample labeling and handling by checking appropriate boxes below:
Top 1-inch layer removed for Be-7 analysis Remaining sample homogenized
VOC collected Sample jars stored on ice
Deviations/Comments:
GRAD SATTER COLLECTION NOT OBSERVED DUE TO TEMPORE BOAT TEMPORTY COLLES TO PROLESSING FAMILITY.
TEMPER BUTTEMAPORTING COULD TO PROLESSING FRAULTY.
Correct decontamination procedures performed for field equipment (if applicable):
Proper decontamination solutions used Decontamination waste collected for proper disposal
Additional comments on sampling operations (if necessary):
reduction comments on sampling operations (it necessary).
Malcolm Pirnie Inc Oversight Staff's Name (printed):
Oversight Staff's Signature Date:
Oversight Staff's Signature Date:
3/11/200 B

Total # of pages: 8 of 9

#### Passaic River Study Area CPG Oversight Project Remedial Investigation Sediment Sampling and Analysis CORE SAMPLING Target Sediment Core Location: Sediment Core Designation: Date: 2008-022-090 Northing: 739764 Time: Easting: 600366 Name(s) of Contractor Samplers (Include Boat Captain Name): JOHN WETMER STENCY SADOTAN Necessary information (specified in core collection SOP) Sampling locations agree with those recorded into the field notebook: specified in the QAPP/FSP: les Yes No (comment:) Yes Core advanced via: Was the core tubing rinsed thoroughly between attempts? Pushing (piston/hand) Vibracore Yes No n/a Comment): Was the vibracore motor turned on immediately after the Was a core catcher used? If so, why? core tube penetrated the sediment? Yes No cose carethre used THEOLYHOX FROYENT Were multiple attempts made to advance the core? Was a short core collected? Yes No Comment: Yes No Short Core Designation: Northing: Easting: Offset from Target:

Total # of pages: 9 of 9 Core Attempt Chart TSI Core ID #: Tube Diameter (in) Sample Type (core/ grab/field blank) Penetration Depth Core Attempts Recovery Depth Offset (ft) Recovery % attempt\* Tube Material Disposition of Northing Easting 739771 43 600371.99 -39/8 Roser . 88 600377.78 18.8 35/8 Colo 63 739781.43 600374.41 22 Final Comment of the 2.2 \*Disposition: R-Relocation/A-Abandoned/D-Disposed/ S-Save until complete/F-Final Saved Confirm core labeling and handling by checking appropriate boxes below: Core Labeled Core Sealed Marked with "Up" Stored (iced, under tarp) Deviations: Correct decontamination procedures performed for field equipment (if applicable): Additional comments on sampling operations (if necessary): C5 HO LOODDHATES OSTAINED. ACTUAL PENETRATION WAS

G.O' WITH Z.O' OF FELCONORY. CORE RESTAINED FOR

PERCENING, APPRIAGED TO BE F-C PHO BROWN SAND & Malcolm Pirnie Inc Oversight Staff's Name (printed): Oversight Staff's Signature Date:

9/11/2018

#### Passaic River Study Area CPG Oversight Project Remedial Investigation Sediment Sampling and Analysis **Daily Oversight Summary Form** Form Designation: LPRRP-01-Summary Form Date: Weather Conditions: Affect Sample Quality: Air Temp (F): 24-Hour precipitation: AM: 200- 4 Min: 4 5030F Yes No Max: (if yes, describe in problems section.) End: Water Temp (F): Yes No Amount (in): (if yes, describe in problems section.) Oversight Staff Assignments: Other personnel conducting Name: Team/Activity Observed: oversight/official visitors: Buyers Aug STEME CARNING TO JOHN ROLFE- DEMAINS JAY DELOGIE (420-031 MIKE HAUSE - ENSIL JOSE HOLLER - ENSE Deviations from USEPA-approved work plans: Core collection activities: Total # Observed/Reported: # Reported: Cores: Blanks Abandoned Other TSI Core ID# Tube Material Recovery Description (%) and Type/Length Disposition 2008-CLEC-DAI CL 9' COL ENGUL 5.5' PROCONNEY (10%) SMGO " CZ ? CORE EXCUEL 4.5' ESLUCEY (75%) 3MBD 4-4 DELLIEUX (\_7390) -5/1150 2008-012C-042 CI 9' Cook Expert 6.2 \$5.01607 (10390) SAICO 9 COME THORNS

# LPRRP 01-Daily Oversight Summary Form Total # of pages submitted \_\_\_\_\_\_ 7

Split sample collection activities:	Total # Observed/Report	ed:/	
# Reported: Cores:Bla	inksAbandoned	Other	
Split sampling activities: 40	SALT SATTAIN	4- ACTIVITIES PREFORMED	
TSI Core ID#	TSI Sample ID#	Comments/Analyses	
	district of the second		
	Terrange Andrea	TOTAL PART AND A BARANCA A	
Decontamination activities: Total	I # observed Lab:	Total # observed Boat:	
		<del></del>	
Split sample activity comment:	***************************************		
			······································
Problems encountered/solutions in	mplemented (if necessary)	):	
		- YESSEL "WILL DU"	
AS A EXESSIST, C	MINESTO TONINA	E SOURCED A SE STEA	42.
SATPLES BECAUSE	ENDERCY SEC	of transports '	
	OCE 550 - 1 C 7-7	KINT INTERNALLY	
Pod Codestion	*		
Verena de la constanta de la c			
Safety concerns/issues (if any):			
MONE HOTED.			
	ACT - C-100 -		
A. J. Phys. Lett. 1 (days and conf. of the c	. ele`a		
Additional observations/comments events conducted):	: (If necessary), include a d	lescription of any water column sampling	ng
erento emutorea.			
	Virtualismus management property of the Virtual Anti-Anti-Anti-Anti-Anti-Anti-Anti-Anti-		
	7 V.		
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Miscellaneous comments	•		
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			*
Core/grab collection	Field activities observed	Total number of	Lab activities observed by
tasks completed by	by government oversight	cores/grabs processed	government oversight
CPG:	personnel:	by CPG:	personnel:
Cores:	Cores:	Cores:	Cores:
Van Veens/Grabs: 5	Van Veens/Grabs:	Van Veens/Grabs:	Van Veens/Grabs:
Abandoned: 1 4245	Abandoned:	Blanks:	Blanks:
Blanks:	Blanks:	Samples shipped:	Decon Activities:
Decons:	Decons:		Splits Taken:
			o, eur resultant
Malcolm Pirnie Inc Field	Representátive Signature:		
	MANUEL CONTRACTOR		
Printed Name:	4		
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and a	The state of the s		

Total # of pages: 4 of 9

Passaic River Study Area CPG Oversight Project						
Remedial Investigation Sediment Sampling and Analysis						
	CORE SAMPLING					
Sediment Core Designation: Target Sediment Core Locat			tion: Date:			
2008-CRC - OAI	Northings we are not	Time:				
	Northing: 702137 Easting: 585002	11 nowe				
Name(s) of Contractor Samplers		:): ~\\				
STEVE CHOOMS WY OS			): MIKE HAVEE > EVER			
TAY OBLOCKIND		ノにん	11 MONAGAL )			
Necessary information (specified in core collection SOP)			Sampling locations agree with those			
recorded into the field notebook:			specified in the QAPP/FSP:			
Yes No (comment:)			Yes No			
Core advanced via:	and the same of th	Was th	e core tubing rinsed thoroughly			
Pushing (piston/hand) Vib	pracore	between attempts?				
Other (comment):		Yes No Na				
Sales (comments).						
		THE PROPERTY OF THE PROPERTY O				
Was the vibracore motor turned of	•	Was a core catcher used? If so, why?				
core tube penetrated the sediment?			Yes No			
Yes No			COSE CATCHER'S USED THROUGHOUT FREGRANT			
		THILOU	thori Leader,			
Were multiple attempts made to advance the core?			Was a short core collected?			
Yes No Comment:			Yes No			
		· · · · · · · · · · · · · · · · · · ·	ore Designation:			
			3-UZC-041 62			
	·	X F . F *				
		Northin	g: 702 136.58			
		Easting: 585598-81				
			•			
		Offset from Target: 3,2				
			Some surger was been			
,		h/A/~40.4x4.4x4.44				

Total # (	of pages: 5 of	. Of								
Core An	tempt Chart	*		a a marine des selections de Article (1997) est estate					· · · · · · · · · · · · · · · · · · ·	
TSI Core	a 1D 77;									
Core Attempts	Northing	Easting	Offset (ft)	Tube Diameter (in)	Sample Type (core/ grab/field blank)	Tube Material	Penetration Depth (w) PT.	Recovery Depth	Recovery %	Disposition of attempt*
Luba	702138:22		1.35	3 <sup>5</sup> /8	u	Ď.	5.5	5.5	100	<i>(</i> 2
<i>C</i> 2.	702136.58	585598.8	3.Z.	3%	<u> </u>	Ş	6.0	4.5	75	5
Final					Account of the control of the contro					
*Dianasi	tion: R-Relocation/A	A t		1/				<u> </u>		
Core I  Deviation  Correct d  Proper		edures performed ions used De	for fic	d with "U eld equi mination	Jp" pment (if	Sto	ored (ice			
Both	COSTS APPRIL SILVE TO	TOTAL O		<del>*************************************</del>	MATIVE	CHEST AND STREET	CON	**************************************	**	0 F
annught and delight of the best state of the second of the				ellelelelele vollelele vollelele volle				erreron de la composito de la	********	
186	Pirmie Inc Oversight	Staff's Name (prir	ited):							
	Staff's Signature	r NN		·^	Date		_			
				and the control of th	ļ.	4.	1/22/	2008		,,,,,,,,,,,,

Total # of pages: \_ 6 of 9

Passaic River Study Area CPG Oversight Project Remedial Investigation Sediment Sampling and Analysis									
GRAB SAMPLING									
Sediment Grab Designation: Target Sediment Grab Local				Locatio	A #				
	5-CURL-041	Northing: 762 Easting: 58		CA-SEE	1	7/22/2008 Time:			
Name(s) of Contractor Samplers (Include Boat Captain Name):  The factor Samplers (Include Boat Captain Name):  The factor Samplers (Include Boat Captain Name):  The factor Samplers (Include Boat Captain Name):									
Necessary information (specified in grab collection SOP) recorded into the field notebooks:  San thou					Sampling	pling locations agree with e specified in the QAPP/FSP? es No			
Identify the type of grab sampler used (e.g., ponar dredge, van veen sampler, or box corer):  Was the sampler rinsed properly between multiple grab attempts at the same location?  Yes No n/a Comment:									
Grab Att TSI Grab	empt Chart								
Grab Attempts	Northing	Easting	Offset (ft)	Sample Type (grab/field blank)	Disposition of attempt*	Other Observations			
61	702 (33.5)	585575.88	30	Gertleri	A				
. 40%	702130.32			6740		SILT COLLETTO			
43 Final	<u> </u>	585606.24		4800	5	YOU COLLURD			
*Disposit	ion: R-Relocation/A S-Save until con	-Abandoned/D-Dis nplete/F-Final Save	•			<u> </u>			

### LPRRP-03b-Grab Sampling

Total # of pages: 7 of 9	
Confirm grab sample labeling and handling by checking appropri	ate boxes below:
Top 1-inch layer removed for Be-7 analysis Remaining sample	e homogenized
VOC collected Sample jars stored on ice	
Deviations/Comments: V-ABILE TO OBSERVE COLLEGE PARTO TELLORE BOAT TRANS TO PROCESSING FAULT	GRAS SATTPLE
Correct decontamination procedures performed for field equipme	
Proper decontamination solutions used Decontamination was	te collected for proper disposal
Additional comments on sampling operations (if necessary):	
Malcolm Pirnie Inc Oversight Staff's Name (printed):	
viateom i fine the oversight staff's (γinted).	
Toughas Aus)	
Oversight Staff's Signature	Date:
X-KILL	9/22/2008

Total # of pages: 8 of 9

Passaic River Study Area CPG Oversight Project Remedial Investigation Sediment Sampling and Analysis						
CORE SAMPLING						
	Target Sediment Core Locat	ion: Date:				
2008-WIL-0AZ	Northing: 702 1160  Easting: 585643  Time: 1100					
Name(s) of Contractor Sampler	s (Include Boat Captain Name	JEFF HOWERZ ENGR				
Necessary information (specific recorded into the field notebook Yes No (comment:)		Sampling locations agree with those specified in the QAPP/FSP: Yes No				
Core advanced via:  Pushing (piston/hand)  Other (comment):	Was the core tubing rinsed thoroughly between attempts?  Yes No Na					
Was the vibracore motor turned core tube penetrated the sedime Yes No	*	Was a core catcher used? If so, why? Yes No				
Were multiple attempts made to Yes No Comment:	advance the core?	Was a short core collected?  Yes No				
		Short Core Designation:  2008 - 424 - 042 - 42  Northing: 702   20 . 4				
		Easting: 585641-32  Offset from Target: 4.7				

Total # of pages:										
Core Attempt Chart										
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September 25 – CPG Oversight of portable Vibracore operations.

- Arrived at the CPG field facility at 7:20 AM
- Signed in the visitor log
- Attended a Health and Safety briefing and then signed the site safety log
- Received a brief tour of the facility and the sample processing area. Samples were not being processed at the time.
- Captain Al discussed with me the planned activities for the day
  - O Vibracore sample collection at station locations: 93, 94, 91, and 92
  - Provided with a "track changes" copy of the September 16<sup>th</sup> version of the SOP for "Sediment Coring Using a Vibracorer".
  - Discussed that I would be on my own, that I should stay 10' from shore of the river, and call if I need assistance
- Drove to the river location where Station 93 and 94 were located. This is approximately at RM 16.5
  - Took Photographs and observed the Vibracore boat crew from the shore.
  - No Vibracore samples were retrieved from these two locations. An aluminum core tube, without a liner or core catcher, was used. A small "Little Champ" Vibracore was utilized. This consisted of an electric concrete vibrator clamped to the aluminum core tube. An onboard electric generator powered the vibrator. It appears that the procedures that were followed are those identified in 5.1.4 for two-person Vibracorer, although the samples were attempted from a boat which has specific SOP found in 5.1.3. I believe they used the 5.1.4 procedures instead of the 5.1.3 procedures was due to the fact that the project Vibracore vessel could not navigate into these shallow waters, nor navigate beneath the low clearance bridges. Deviations from this are listed below.
    - Crew indicated that there were a lot of rocks and the Vibracore could not penetrate this location
    - The vessel was relocated as stipulated in the SOP, however penetration was still unsuccessful due to the rocky conditions.
    - I was not aware if a Ponar dredge sample was successfully obtained or even attempted, although I was told that they had a Ponar dredge aboard in the event a Vibracore attempt was unsuccessful
  - The Vibracore tripod (tower) was not erected at these locations. The crew commented to me that the tripod would have been erected had the Vibracore penetration been successful. The tripod is necessary for retrieving the core tube from the sediment. The tripod was not erected prior to leaving the dock because the vessel needed to pass under low clearance bridges on its way to the proposed sampling locations.
- Drove to the river location where Station 91 and 92 were located. This is approximately at RM 16.0
  - Took photographs and observed the Vibracore boat crew from the shore, approximately 50-75 feet from the vessel, and also observed from the Monroe Street Bridge.
  - Vibracore sample was collected from Station 92

- It appeared that deeper penetration of the core tube was prevented due to the concrete vibrator cable reaching the boat "moon pool".
   Deeper penetration of approximately 18 inches may have been possible
- A few attempts were made.
- The tripod was erected at this location to assist with the retrieval of the core tube
- At times the core sample fell from the core tube
- Tube with sample was sounded to determine sample recovery
- Water was drained from the tube by drilling a hole
- Tube was cut using a pipe cutter
- Sample was capped, taped, and labeled as specified in the SOP
- Vibracore sample was attempted at Station 91. A sample was not able to be collected from this station
  - I could not assess whether a Ponar or scoop sample was attempted or collected
- Another CPG vessel was observed near this station. The crew of this vessel went to the train bridge next to the Monroe Street bridge and downloaded data from the HOBO prior to the next day's forecasted storm
- Reported back to the field office to let them know I was OK
- Signed out at approximately 12:30
- Downloaded photographs (To be provided)

#### Deviations from the SOP:

- Aside from using the two-person Vibracore from a boat, the field crew appeared to
  follow the SOP. It is understood why this was necessary and should not be considered a
  deviation.
- No comment regarding Ponar, or sediment scoop, collection of sediments due to not witnessing this operation.
- Based on only one sample being collected, the Vibracore activities appeared to be acceptable

F. Chris Purkiss

## **Attachment B**

Malcolm Pirnie, Inc. Progress Memorandum to EPA and USACE on Initial Oversight Observation of CPG Sediment Coring Program (dated August 12, 2008)



## Interoffice Correspondence

Date: August 12, 2008

To: Alice Yeh

Copy: Len Warner, Beth Buckrucker

From: Erika Zamek

Re: Summary Memo on LRC Oversight to Date

Oversight of Cooperating Parties Group (CPG) sediment probing, core collection, and core processing activities began on July 25, 2008. To date, a single deviation from the approved standard operating procedures has been observed: one core sample was not allowed to sit in the sediment for ten minutes prior to retrieval. This deviation was corrected in the field. While observed activities have, with the exception of the above, been in accordance with the approved procedures, oversight personnel have raised a few items that require discussion. These topics are described below.

**Use of wire to divide core segments:** Use of this method to divide the core segments results in a top-to-bottom smear zone down the center of the segment, creating the potential for cross-contamination along the entire length of the segment. Unlike the outer smear zone created during core collection, this inner smear zone is included in the material that is homogenized and sent for analysis.

While the surface area of the wire is small, and the amount of smearing caused by the wire alone is likely not significant, use of the method to divide segments where the core contains large-grained materials (*e.g.*, gravel or cobbles) creates a significant potential for cross-contamination. Coarse-grained particles within the segment could become caught on the wire and dragged such that cross-contamination of samples may be possible. The entrained rock or cobble could push along sediment ahead of it on the path through the segment, increasing the uncertainty in the interpretation of the data.

**Split Sampling Coordination:** To date, CPG core processing personnel have made every effort to accommodate the needs of Oversight personnel. The area where the needs of the two groups have been a challenge to reconcile is split sampling coordination. CPG personnel have been receptive to the need to collect split samples from the one-foot sections, but have indicated that collection of a third core (and potentially a fourth core) may be necessary to provide the sediment volume required by the two analytical programs for a one-foot section. This requirement may introduce greater uncertainty

into the coring data due to the spatial heterogeneity expected to be encountered, but it does not seem avoidable at this point.

In addition, the timing of processing activities makes the collection of split samples from a variety of locations difficult. Volatile organic compound (VOC) holding times dictate that split samples must be shipped on the day of collection, and use of Forms II Lite (required by the Contract Laboratory Program) adds significant time to the processing of split samples for shipment. Oversight personnel must leave the processing facility no later than 3 pm on days that split samples are collected in order to complete the paperwork and packing necessary for split samples to be shipped out the day of collection. The current CPG core processing schedule has activities starting around 11 am, leaving an approximate four-hour window for Oversight personnel to obtain split samples. This window allows the collection of splits from a single coring location each day, but not necessarily from multiple locations.

Sediment Probing Attempt Coordinates: Personnel conducting sediment probing oversight indicated that while the actual coordinates for probing locations were stored in the on-board GPS unit, probing personnel directed Oversight personnel to the target coordinates presented in the Quality Assurance Project Plan (QAPP) and would not provide the coordinates for locations where sediment probing was performed. It appears that this issue has been resolved for core collection activities. Oversight personnel have had no trouble obtaining the coordinates for successful and unsuccessful coring attempts.

Oversight of core processing from inside the tent: The initial days of core processing oversight were conducted from outside the tent. During the August 5 biweekly call, the Environmental Protection Agency directed that Oversight personnel should watch core processing from inside the tent. Tuesday, August 12, will be the first day where this will occur; any observations on the logistical difficulties (or lack thereof) should be discussed.

**Use of core catchers:** To date, core catcher use has been in accordance with the approved procedures. The CPG has encountered material at several different locations which could not be successfully collected without the use of a core catcher. The approved vibracore sampling procedure allows automatic usage of a core catcher in similar material for the duration of the program; use of this device should be monitored to ensure that when sampling activities move into more cohesive sediments, the use of core catchers is discontinued.

Please contact me at (914) 641-2961 with any questions regarding this information.

# **Attachment C**

Malcolm Pirnie, Inc. Quality Assurance Field Audit Report on 2008 Split Sample Collection (dated September 24, 2008)

## **QUALITY ASSURANCE (QA) FIELD AUDIT REPORT**

**Project: Lower Passaic River Restoration Project 2008 Sediment Corning CPG Oversight** 

Date of Audit: September 24, 2008

**Project Address:** Environmental Consultants and Engineers (ENSR)

Field Facility, 1 Madison Street, East Rutherford, NJ

Activities Audited: Sediment Processing Oversight, Split Sample Collection, and

Shipment

Auditor's Name: Jim McCann

**Phone:** 201-398-4310

# Personnel present during split sample collection at CPG Sample Processing Field

**Facility**:

Name	Representing	Role
Carolyn Zeiner	Malcolm Pirnie, Inc.	Sample Processing
		Oversight and Split Sample
		Collection/Transfer
Don Boye	ENSR	Site Supervisor on duty and
		provider of Health and
		Safety Plan Review
Teresa Watson	ENSR	Geologist and lead person
		supervising the core
		processing and sampling
Paula Winchell	ENSR	ENSR Sample Management
		Office and Daily Briefing
Kristen Durocher	ENSR	Core processing and
		sampling
Jennifer Musella	ENSR	Core processing and
		sampling
Jennifer Reed	ENSR	Core processing and
		sampling

# Personnel at the Malcolm Pirnie Inc., Fair Lawn, New Jersey Office packing/shipping the samples:

Name	Representing	Role
Carolyn Zeiner	Malcolm Pirnie, Inc.	Oversight Split Sample
		Transfer
Xiulan Wang	Malcolm Pirnie, Inc., at	Split Sample Management
	Fairlawn NJ office	Office using Forms II Lite
		and sample packing
John Cole	Malcolm Pirnie, Inc. at	Split Sample packaging and
	Fairlawn NJ office	drop-off at Fed Express

#### **Auditor's Comments:**

Overall, the oversight personnel adhered to the requirements of the procedures outlined in the Oversight Quality Assurance Project Plan (QAPP) (Malcolm Pirnie, Inc., 2008). Carolyn Zeiner carefully observed the samples processing, communicated effectively with the ENSR sample processing personnel and documented their actions during the sediment processing.

During the QA audit, samples were collected by the ENSR personnel, from co-located sediment cores collected early that morning. Carlyon Zeiner observed the sample processing in the restricted processing area which was inside an enclosed ventilated tent in the center of the field facility. The split samples were selected by the ENSR geologist with the agreement of Carolyn Zeiner, who documented the sample collection using the forms provided in the QAPP. There were no major problems or deviations observed during the collection of the split samples, but the following minor issues were noted:

- Due to the soft consistency of the sediment being processed, the ENSR sampler encountered some difficulty filling the Encore samplers provided for the collection of the split samples for Volatile Organic Compound (VOC) analyses. To overcome the problem, she employed clean spoons to insure that the samplers were full. Consideration should be given to either providing alternate VOC sampler containers and or modifying the VOC collection procedure in the event that very soft sediments are encountered in the future.
- 2. Single 4 oz. jars were provided (labeled) for the collection of the split sample for both total petroleum hydrocarbon (TPH) and total organic carbon (TOC) analyses, since both tests are performed by Hampton Clarke. During the split sample collection, Teresa Watson, the ENSR geologist, mentioned that she did not intend to collect the ENSR samples for TOC and TPH from the same co-located cores. To insure that the split sample would be collected from the same homogenized core segment additional 4 oz. sample jars were obtained by the oversight

personnel. Separate split samples were collected for TOC and TPH from the same homogenized core segment sampled by ENSR. TPH and TOC split samples may have previously been collected by ENSR from different co-located core sections. This information would have been recorded on the previous week's oversight sampling forms and should to be considered when evaluation the split sample data. For the remaining split sample collection events arrangement were made to provide separate jars THP and TOC split sample analyses.

3. Field duplicate split samples have not been collected yet during the split sample program. Arrangements will be made with ENSR to provide sufficient material so field duplicated split samples during the next few weeks.

The following table documents observations made during the QC audit and additional comments, if necessary:

AUDIT CHECKLIST AND OBSERVATIONS					
Item	Yes/No	<b>Observations and Comments</b>	Corrective Action		
Did the oversight personnel follow safe practices?	Yes	Upon arriving at site ENSR provided an orientation to the processing facility, including a safety overview. Personnel within the sample processing restricted area were required to wear personnel protective equipment at all times.	NA		
Were the split samples homogenized prior to collection?	Yes	With the exception of the VOC samples, which were collected as grab samples, the samples were well homogenized with a spoon in a stainless steel bowl prior to collection.	NA		
Item	Yes/No	<b>Observations and Comments</b>	Corrective Action		
Did oversight personnel obtain the intended number of intended oversight samples?	Yes	All of the selected samples were provided.	NA		
Were the required QC and field duplicate samples collected per the QAPP?	Yes	Field duplicates have not been collected yet and should be collected over the next few weeks.	NA		

Were the split samples packed and properly preserved upon after collection and transfer?  Was documentation kept by oversight personnel of the sediment core processing and split sample collection?  Was the Chain of Custody (COC) form properly completed documenting the transfer of the sediment samples custody to the oversight team?	Yes	The samples were placed in coolers packed with ice for transfer to the Malcolm Pirnie, Inc. office in Fair Lawn, New Jersey to be entered into the computer system using Forms II Lite software and for final packaging and shipment to the laboratories.  QAPP Attachment 8, Oversight Forms were completed by the Malcolm Pirnie, Inc. oversight person.  The transfer COC was properly completed. A copy of the COC was also sent to the Malcolm Pirnie, Inc., Fair Lawn office. After all the samples were collected, the samples were transferred on ice in a cooler to the Malcolm Pirnie, Inc. Fair Lawn office where they were repackaged in separate coolers for shipment to the appropriate individual laboratories.	NA NA
Item	Yes/No	Observations and Comments	Corrective Action
Was the sample information entered into Forms II Lite per the Oversight QAPP?	Yes	The information was properly entered into the computer at the Malcolm Pirnie, Inc. Fair Lawn office using the Forms II Lite by, Xiulan Wang who served as the sample management officer.	NA
Were the samples properly labeled?	Yes	The samples arrived at the Malcolm Pirnie, Inc. Fair Lawn office labeled using a water proof marking pen. New sample labels were printed using Forms II Lite and placed on each sample jar and covered with clear tape to protect them from moisture prior to	NA

		shipment to the labs.	
Were COC forms generated by Forms II Lite placed in each sample coolers?	Yes	The appropriate COC form protected in a plastic bags were taped to the inside cover of each cooler except in the case of cooler for Hampton Clarke which will be picked up by a courier.	NA
Were properly packaged, custody seals applied and the coolers properly sealed?	Yes	The samples were well packaged per the Oversight QAPP. Custody seals were applied to each sample and the coolers sealed with tape.	NA
Were the samples properly preserved before final shipment to the labs?	Yes	As much ice as possible was added to each cooler before they were sealed for final shipment to the individual laboratories.	NA
Were the samples successfully shipped?	Yes	Shipping paper work was properly completed. The sample coolers for the Axys Analytical and the USEPA assigned CLP labs were shipped that evening via Fed Express. The cooler with the samples for Hampton Clarke picked up by a courier supplied by the laboratory. The laboratories were notified of the sample shipments by Xiulan Wang via electronic mail.	NA

# **Attachment D**

Malcolm Pirnie Split Sample Comparison of 2008 CPG Sediment Coring Data (dated October 5, 2009)



## Correspondence

Date: October 5, 2009

To: Alice Yeh (USEPA)

Elizabeth Buckrucker (USACE)

From: Malcolm Pirnie, Inc.

Re: Statistical Comparison of 2008 Low Resolution Split Sample

Sediment Data

Lower Passaic River Restoration Project W912DQ-08-D-0017, Task Order 0010

## Summary

This memo presents the results of a comparison between samples from the Cooperating Parties Group (CPG) 2008 Low Resolution Coring Program and split samples collected by Malcolm Pirnie for U.S. Environmental Protection Agency's (USEPA's) oversight effort. Overall, significant and substantial biases were observed for dioxins/furans (except for OCDF), TOC and PAHs (except for Anthracene). In particular, for 2,3,7,8-TCDD, which is a major risk driver in the Lower Passaic River, the CPG concentrations were significantly lower compared to corresponding USEPA split samples. For TOC, which is a constituent of importance with respect to organic chemical fate and transport, the concentrations reported for the CPG samples were significantly higher than those reported for USEPA split samples. The median differences in PAHs were greater than 20 percent in almost all chemicals analyzed. Differences in PCBs, pesticides and metals concentrations were generally within 20 percent; however in some cases these differences were found to be statistically significant.

#### Introduction

The CPG 2008 low resolution sediment coring program consisted of 126 sediment core locations from river mile (RM) 0 at the confluence of the Lower Passaic River and Newark Bay to RM17.4 at the Dundee Dam. Cores were segmented systematically with the following scheme: 0-0.5 foot (slice A), 0.5-1.5 feet (slice B), 1.5-2.5 feet (slice C), 2.5-3.5 feet (slice D), and then 2-foot segments to the core bottom. Government oversight split samples (herein referred to as "USEPA split samples") were collected from 4 percent of the CPG samples, yielding 30 split samples plus two field duplicates. The purpose of the split sample program was to provide an independent analytical dataset that can be compared to the CPG samples to investigate precision, accuracy, and potential bias.

The sediment samples were analyzed for selected chemicals of potential concern (COPCs), and chemicals of potential ecological concern (COPECs) including: dioxins/furans, polychlorinated biphenyls (PCBs), semi-volatile organic compounds including polyaromatic hydrocarbons (PAHs), pesticides including dichlorodiphenyltricholoroethane (DDT), and metals. In addition, all samples were analyzed for total organic carbon (TOC) content.

The objective of this analysis was to evaluate whether a bias exists between the CPG and USEPA split sample data by statistically comparing the split sample results for selected compounds from the various COPC and COPEC chemical groups.

## Methodology

The comparison of paired data sets for measurement bias can be done by graphical methods to visualize the differences, as well as by formal statistical tests to determine if the paired differences are significant. Both methods were used in this analysis. Note that ordinary linear regression analysis was not considered because both data sets are subject to errors, and this is a direct violation of one of the ordinary linear regression assumptions. Furthermore, because the chemical concentrations are not normally distributed, non-parametric methods were selected to test for significant differences in data pairs and to estimate the differences. Although normality may be achieved by power transformations and the parametric t-test performed on the power transformed data, it may then become difficult to translate the results back to the original units.

Three different graphical methods were used to display the data sets, including:

- Line plots of absolute concentration for the various paired samples a line plot provides insight on the relative magnitudes and patterns of concentrations measured by both analytical programs for each paired sample.
- Scatter plots of the measured concentrations a scatter plot illustrates the relationship between the CPG samples and USEPA split samples, and in particular, reveals any bias based on the scatter of points above or below the 1-to-1 line.
- Bland-Altman plot (Bland & Altman, 1986 and 1999) a type of plot typically used in analytical chemistry and biostatistics to analyze the agreement between two different assays. It is a graphical method in which the point differences (or alternatively percent difference or ratios) between the two data sets are plotted against the point averages of the two data sets. In this analysis, the differences in concentrations between CPG samples and USEPA split samples were not used because of increases in the variability and magnitude of the differences as the magnitude of the measurements increases. Instead, the ratios of the point measurements were plotted with a horizontal line drawn at the mean ratio for comparison to the ideal ratio of 1. In addition, for 2,3,7,8-TCDD and total tetradioxin, uncertainty is denoted by the lower confidence limit (LCL) and upper confidence limit (UCL) of the mean ratio. The LCL and UCL of the mean ratio for

2,3,7,8-TCDD and total tetra-dioxin were determined by the non-parametric bootstrap technique. The LCL and UCL were only calculated for 2,3,7,8-TCDD and total tetra-dioxin due to project schedule and budget constraints.

The closeness of the agreement among the individual measurements was assessed using formal statistical testing of the difference between paired data points. In this analysis, the non-parametric method called the Wilcoxon signed-ranks test was used to determine whether the USEPA split sample data are significantly different from the CPG data. Because there is an increasing difference between the data and the 1-to-1 reference line as concentrations for all chemicals increase, multiplicative differences between the CPG and USEPA split sample concentrations can be inferred. These multiplicative differences would require a logarithmic transformation to produce differences which were symmetric before the Wilcoxon signed-ranks test could be performed. The test results are reported as probability values (p-values), where p-values less than 0.05 and 0.01 are interpreted as a significant difference between the two data sets at the 95 and 99 percent confidence levels, respectively. In addition, the median differences between CPG and USEPA split sample concentrations were determined based on the Hodges-Lehmann robust estimator ( $\Delta$ ) as follows:

- 1) For each of the N pairs of data estimate the difference d between the logarithmic transformed CPG and USEPA split sample concentrations ( $d_i = \text{Log } x_i \text{Log } y_i$ , i=1, 2, ..., N),
- 2) Form all possible ordered pairs of differences  $(d_i, d_j)$  with  $i \le j$ . There are N(N + 1)/2 such ordered pairs.
- 3) For each of the above ordered pairs, compute the average value  $(d_i + d_i)/2$ .
- 4) The point estimate of the median difference can be obtained by med  $i \le j$  [(di + dj) /2]. The Hodges-Lehmann robust estimator ( $\Delta$ ) is the anti-log of this median estimate.

The Hodges-Lehmann robust estimator ( $\Delta$ ) should be interpreted as "CPG sample concentration =  $\Delta$  \* USEPA split sample concentration". Therefore, the farther from unity (*i.e.*, a value of 1) the Hodges-Lehmann robust estimator ( $\Delta$ ) is, the more of a difference there is between the CPG sample concentration and the USEPA split sample concentration.

Note that the three graphical methods, the statistical test of difference, and the  $\Delta$ , must be considered together in a weight-of-evidence manner, because any one method or test may be subject to the influence of outliers or artificial plotting limitations. For example, in some cases, the scatter plot may be visually compressed due to differing x-axis and y-axis lengths, so that it may be difficult to see the number of points above or below the 1-to-1 line. In those cases, the Bland-Altman plot may better show scatter above or below the ratio-of-one line, because the ratios vary by less than an order of magnitude. In other cases, the mean ratio specified in the Bland-Altman plot may be skewed by a single high value, which may pull the mean ratio line closer to unity, in which case the robust  $\Delta$ 

estimator and the Wilcoxon signed-ranks test provide a better inference on the difference between the concentrations.

For each chemical group the data were pre-processed before the graphical and statistical analyses were performed as follows:

- Dioxin and furans data were restricted to those samples where the reported concentration is five times the sample-specific quantitation limit or greater. This restriction on the data eliminates results that are classified as non-detected concentrations or may be estimated at low concentrations. The chemicals detected above this threshold in at least 14 split sample pairs were selected for evaluation including: 2,3,7,8-TCDD, total tetra-dioxins, 2,3,7,8-TCDF, 1,2,3,4,6,7,8-HpCDD, 1,2,3,4,6,7,8-HpCDF, OCDD, OCDF, total tetra-furans, total pentafurans, total hexa-dioxins, total hexa-furans, total hepta-furans.
- PCBs All PCB homologues and total PCBs were selected for comparison. Six PCB congeners were also examined to represent the trichloro to octachlorohomologue groups, respectively: PCB-18 (2,2',5-trichlorobiphenyl), PCB-52 (2,2',5,5'-tetrachlorobiphenyl), PCB-110 (2,3,3',4',6-pentachlorobiphenyl), PCB-153 (2,2',4,4',5,5'-hexachlorobiphenyl), PCB-187 (2,2',3,4',5,5',6-heptachlorobiphenyl), and PCB-195 (2,2',3,3',4,4',5,6-octachlorobiphenyl). Furthermore, PCB 31, PCB 77, PCB 105, and PCB 118, which are congeners being modeled to examine future surface sediment concentrations, were also considered. For all PCB congener data, only samples where the reported concentration is five times the sample-specific quantitation limit were considered.
- PAHs Selected chemicals representing low molecular weight (LMW) PAHs (including: anthracene, naphthalene and phenantrene) and high molecular weight (HMW) PAHs (including: benz[a]anthracene, benzo[a]pyrene, chrysene, fluoranthene, indeno[1,2,3-cd]pyrene and pyrene) were analyzed. For all the PAH chemicals, only samples where the reported concentration is five times the sample-specific quantitation limit were considered.
- Pesticides The pesticides considered in the evaluation include: DDT and its metabolites (2,4'-DDD, 2,4'-DDE, 2,4'-DDT, 4,4'-DDD, 4,4'-DDE, 4,4'-DDT), dieldrin, and gamma-chlordane. Due to the relatively high sample-specific quantitation limit for these chemicals, restricting the data to those where the reported concentration is five times the sample-specific quantitation limit would have resulted in very few matched pairs for comparison. Therefore, for these pesticides, all concentrations that were not flagged as non-detect by the lab or data validator were directly used for the split sample comparison. Inclusion of all these data, particularly at lower concentrations, will result in a scatter of the data and likely affect statistical test results.
- Metals and TOC Metals selected included arsenic, barium, chromium, cobalt, copper, lead, mercury, nickel, and zinc, which were used as part of the empirical mass balance (EMB) formulation. For these metals, as well as TOC, only samples

where the reported concentration is five times the sample-specific quantitation limit were considered.

#### Results

#### Dioxin/Furan

- Line plots (Figures 1a through 13a), scatter plots (Figures 1b through 13b) and Bland-Altman plots (Figures 1c through 13c) indicate that the USEPA split sample data are systematically higher than the CPG data for all constituents, except OCDF.
- With the exception of OCDF, the paired results predominantly lie below the 1-to-1 line on the scatter plots, and below the ratio of 1 in the Bland-Altman plots. For 2,3,7,8-TCDD and total tetra-dioxins, the LCL and UCL interval of the mean ratio lies below the ideal ratio of 1 and the majority of the ratios fall outside the LCL and UCL interval (Figure 1c and 2c). This indicates that those data sets not only have a low bias, but also are not precise.
- The Wilcoxon signed-ranks test (Table 1) suggests significant differences between CPG and USEPA data for all dioxin/furan chemicals analyzed except for OCDF. The Hodges-Lehmann estimator indicate the most bias occurs for 2,3,7,8-TCDD and total tetra-dioxins results, and the differences between the data sets are significant at the 99 percent level of confidence.

#### **PCBs**

• The PCB homologues and congeners evaluated show differing agreements between the two data sets (Figures 14 through 33; Table 1). In cases where the Wilcoxon signed-ranks test showed statistical significant differences with 95 percent confidence, the differences are mostly within 20 percent, except for PCB 77, total monochlobiphenyls, and total dichlobiphenyls, for which differences are within 30 percent.

#### **PAHs**

• The PAH chemicals evaluated show systematic bias at the 95 percent confidence level, and median differences that are mostly greater than 20 percent (table 1). Scatter plots and Bland-Altman plots (Figure 34 through 42) showed varying degrees of deviation below the 1-to-1 line or the ratio of 1 line for the majority of the data pairs.

#### Pesticides

• The pesticides evaluated show tremendous scatter around the 1-to-1 line in scatter plots or ratio-of-1 line in Bland-Altman plots (Figure 43 through 50). Wilcoxon signed-ranks test indicate no statistical significant difference between the data sets (Table 1). However, the Hodges-Lehman estimator is extremely low for 2,4'-DDT, an indication of the precision issues for this chemical.

#### Metals

• As for PCBs, comparisons of split samples for metals show differing agreements between the two data sets (Figure 50 through 59). Although the differences between the data sets are generally within 20 percent, these differences are statistically significant at 95 percent level of confidence for barium, cobalt, copper, chromium, mercury and zinc.

#### TOC

• Concentrations of TOC measured by the CPG are significantly biased high by more than a factor of 2 compared to concentrations reported for the USEPA split samples (Figure 60; Table 1).

## References

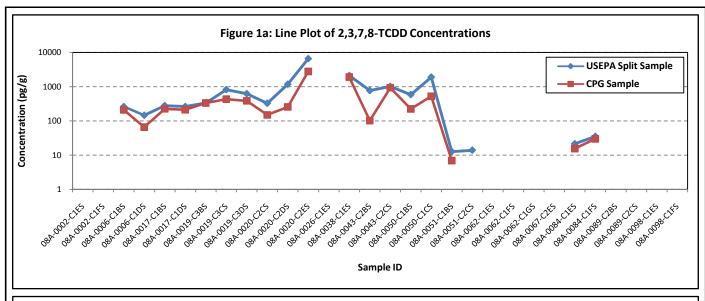
Bland JM, Altman DG (1986). Statistical method for assessing agreement between two methods of clinical measurement. The Lancet, i, 307-310.

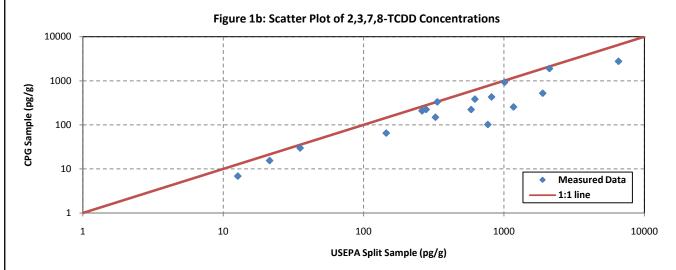
Bland JM, Altman DG (1999). Measuring agreement in method comparison studies. Statistical Methods in Medical Research, 8, 135-160.

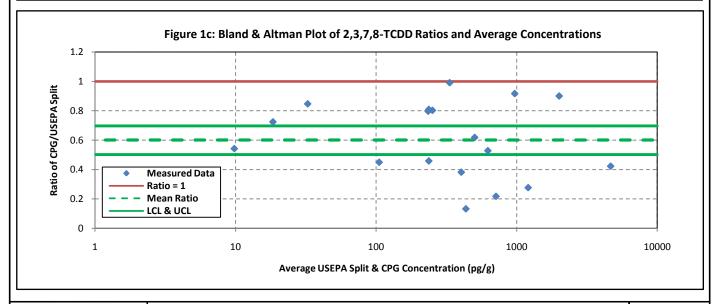
Table 1. Wilcoxon Signed Rank Test Results and Hodges-Lehmann Estimator					
			Significantly	Hodges Lehmann	
Parameter	Analyte	p-value	different?	Estimator $(\Delta)^1$	
	Arsenic	0.054	No	0.930	
	Zinc	0.020	Yes	1.074	
	Nickel	<0.001	Yes	1.150	
als	Mercury	0.044	Yes	1.156	
Metals	Lead	0.128	No	1.097	
2	Copper	<0.001	Yes	1.128	
	Cobalt Chromium	<0.001 <0.001	Yes Yes	1.137 1.208	
	Barium	0.034	Yes	1.082	
	2,3,7,8-TCDD	<0.001	Yes	0.579	
	Total TCDD	<0.001	Yes	0.545	
	2,,3,7,8-TCDF	0.026	Yes	0.753	
S	1,2,3,4,6,7,8-HpCDD	0.008	Yes	0.805	
Dioxins/Furans	1,2,3,4,6,7,8-HpCDF	0.044	Yes	0.798	
ur:	OCDD	0.023	Yes	0.798	
s/F	OCDF	0.056	No	0.802	
cin.	Total TCDF	0.002	Yes	0.727	
<u>6</u>	Total Penta-Furans	0.001	Yes	0.718	
Ο	Total Hexa-Dioxins	0.001	Yes	0.769	
	Total Hexa-Furans	0.001	Yes	0.691	
	Total Hepta-Dioxins	0.010	Yes	0.720	
	Total Hepta-Furans	0.004	Yes	0.707	
	Benzo[a]pyrene	0.015	Yes	0.736	
	Fluoranthene	<0.001	Yes	0.561	
	Anthracene	0.054	No	0.790	
AHs	Phenanthrene	0.022	Yes	0.769	
	Pyrene	0.001	Yes	0.604	
₽.	Benz[a]anthracene	0.010	Yes	0.655	
	Chrysene	0.012	Yes	0.713	
	Indeno(1,2,3-c,d)pyrene	0.002 0.008	Yes	0.671 0.840	
	Naphthalene PCB 18	0.008	Yes	0.840	
	PCB 31	0.039	No Yes	0.851	
	PCB 52	0.000	No	0.980	
	PCB 77	0.001	Yes	0.710	
	PCB 105	0.000	Yes	0.863	
	PCB 110	0.783	No	0.976	
	PCB 118	0.000	Yes	0.863	
	PCB 153	0.059	No	0.931	
	PCB 187	0.010	Yes	0.878	
Bs	PCB 195	0.695	No	1.024	
PCBs	Total Monochlorobiphenyls	0.008	Yes	0.726	
_	Total Dichlorobiphenyls	<0.001	Yes	0.746	
	Total Trichlorobiphenyls	0.000	Yes	0.818	
	Total Tetrachlorobiphenyls	0.000	Yes	0.887	
	Total Pentachlorobiphenyls	0.006	Yes	0.888	
	Total Hexachlorobiphenyls	0.059	No	0.934	
	Total Heptachlorobiphenyls	0.034	Yes	0.910	
	Total Octachlorobiphenyls	0.253	No	0.841	
	Total Nonachlorobiphenyls	0.044	Yes	0.852	
	Total PCBs	<0.001	Yes	0.863	
Pesticides	2,4'-DDD	0.205	No	0.900	
	2,4'-DDE	0.372	No	0.948	
	2,4'-DDT	0.088	No No	0.547	
	4,4'-DDD	0.189	No No	0.864	
	4,4'-DDE 4,4'-DDT	0.346 0.351	No No	1.079 0.840	
<u>م</u>	4,4 -DD1 Dieldrin	0.351	No No	1.048	
	Gamma-Chlordane	0.411	No	1.121	
Ų		0.170	110	1.121	
T0C	Total Organic Carbon	<0.001	Yes	2.279	
Note: Cells high	lighted in yellow are statisticall	y significant at	95 percent confide	nce level.	

Note: Cells highlighted in yellow are statistically significant at 95 percent confidence level.

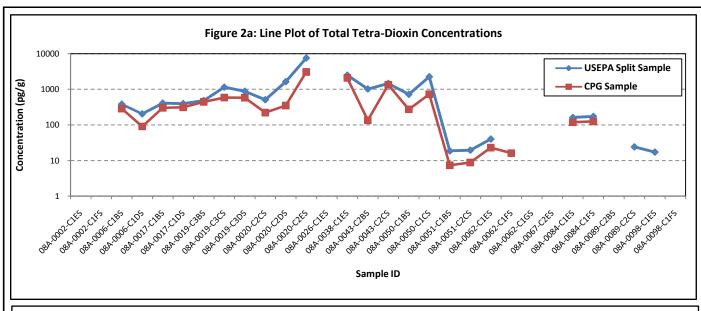
<sup>&</sup>lt;sup>1</sup> The Hodges-Lehmann robust estimator ( $\Delta$ ) should be interpreted as "CPG sample concentration =  $\Delta$ \* USEPA split sample concentration"

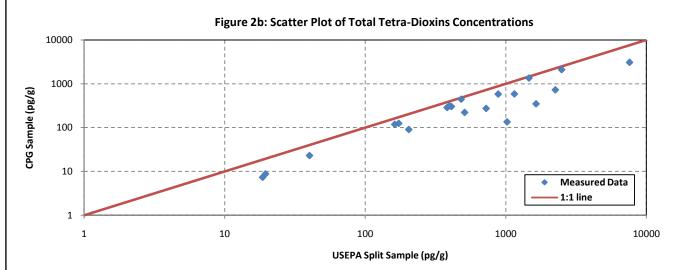


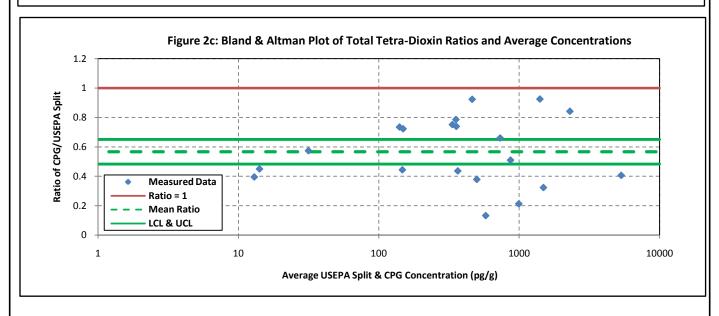




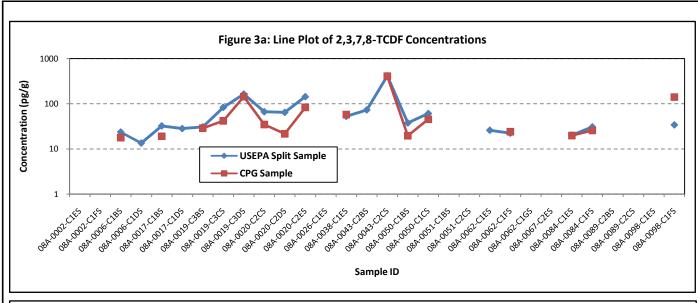


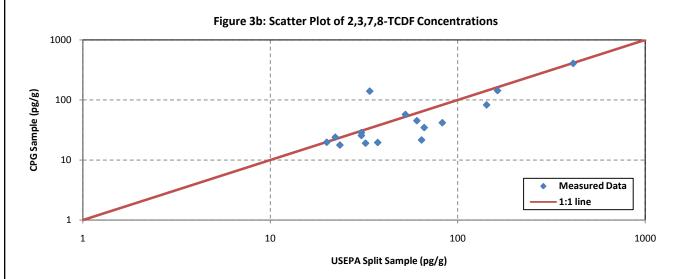


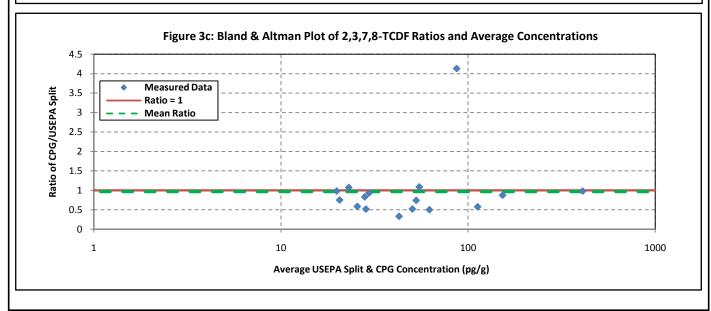




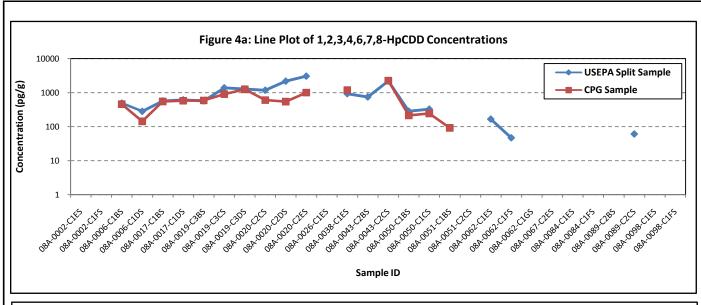


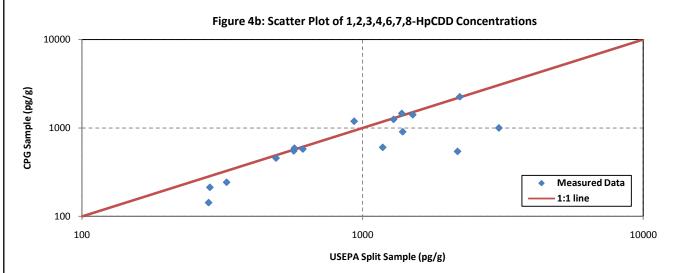


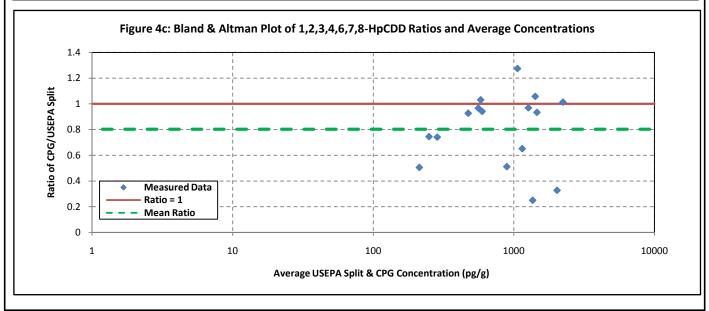




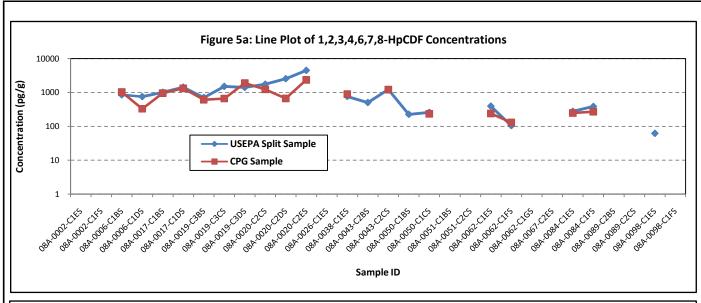


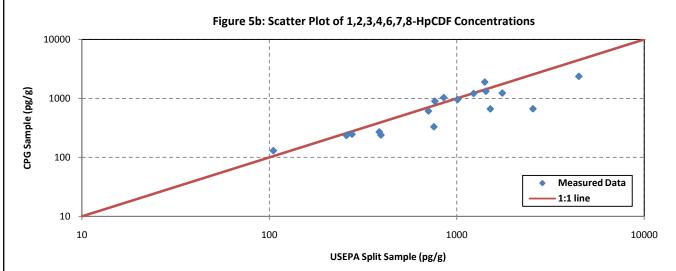


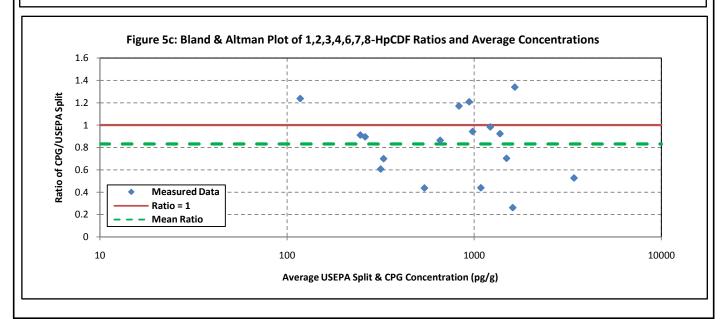




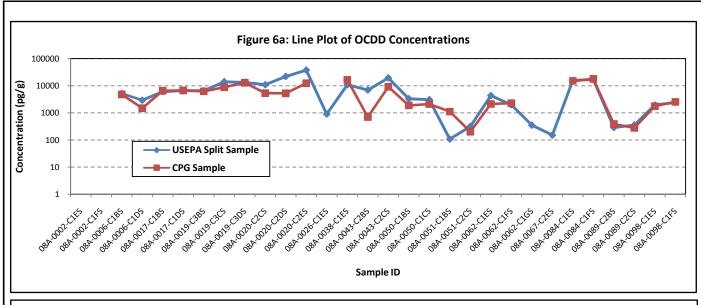


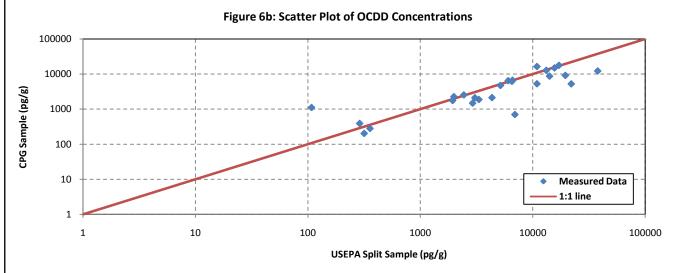


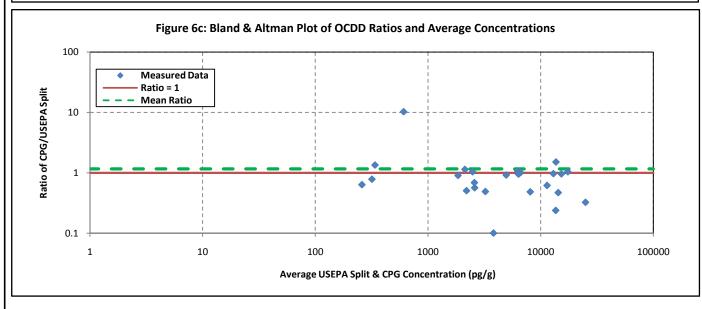




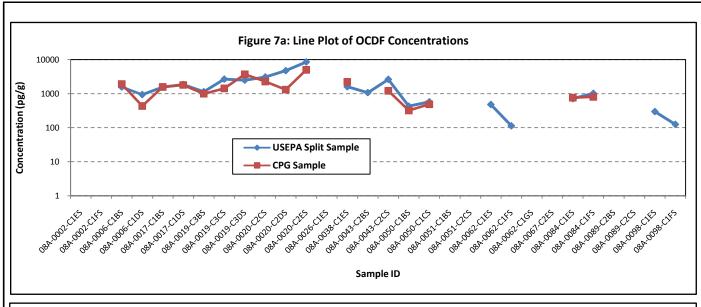


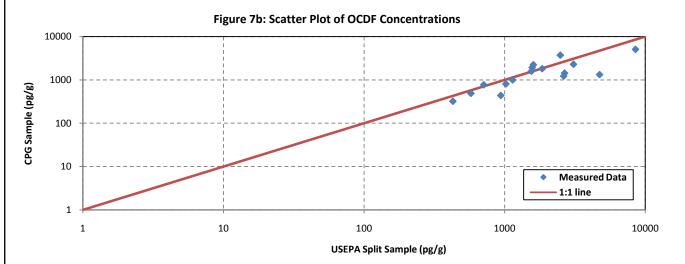


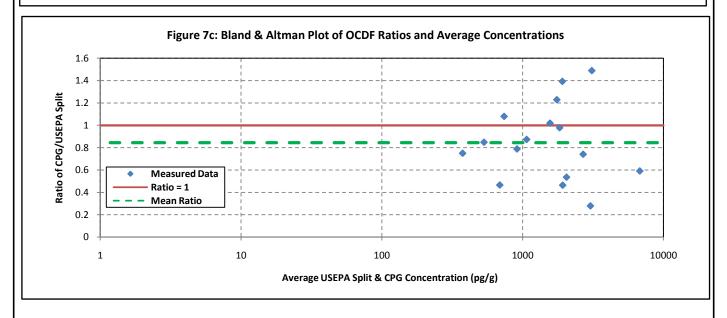






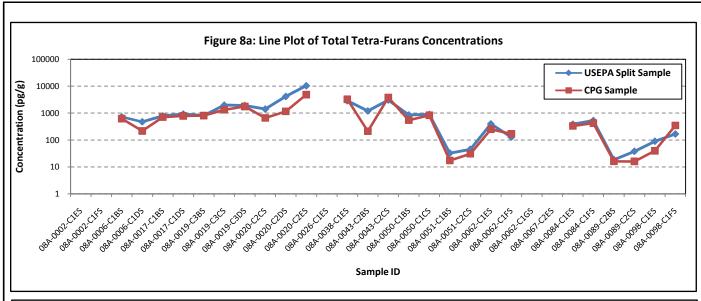


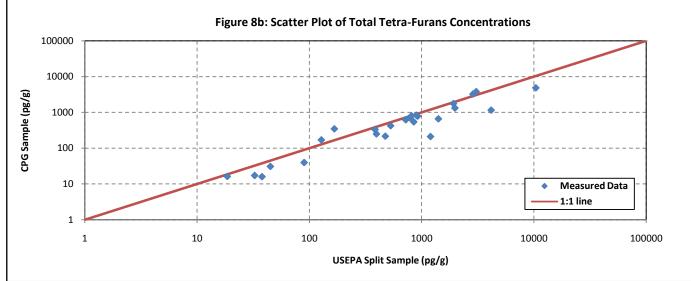


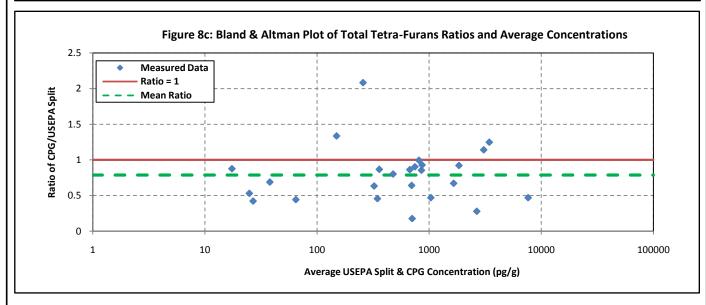




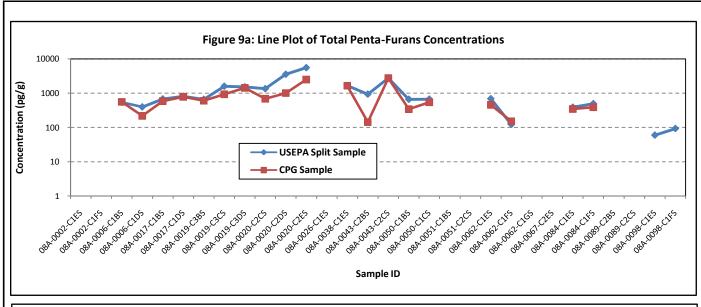


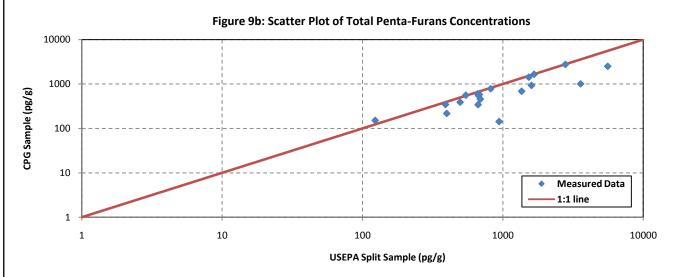


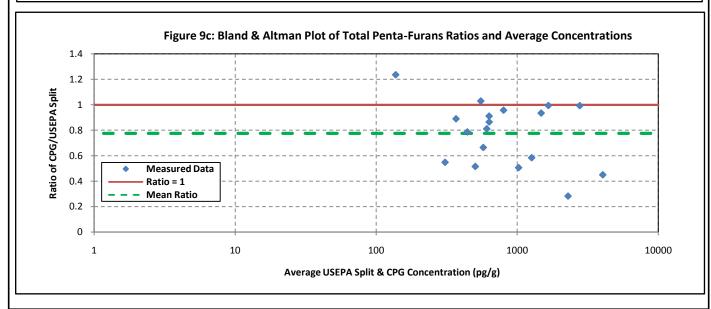




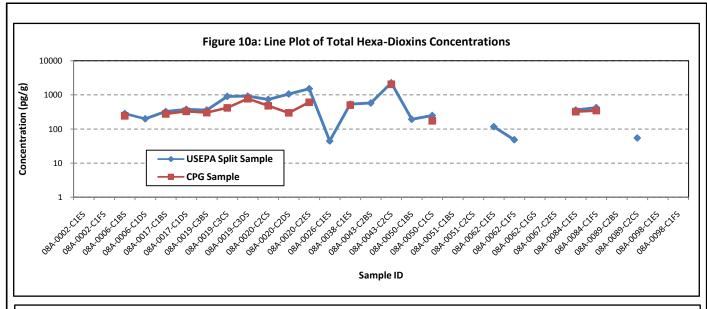


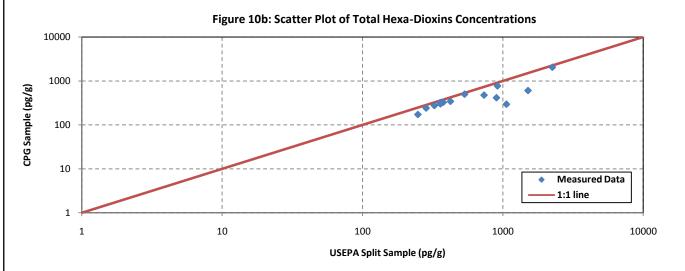


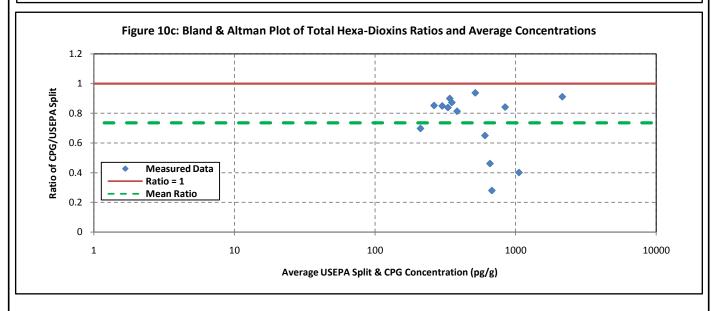




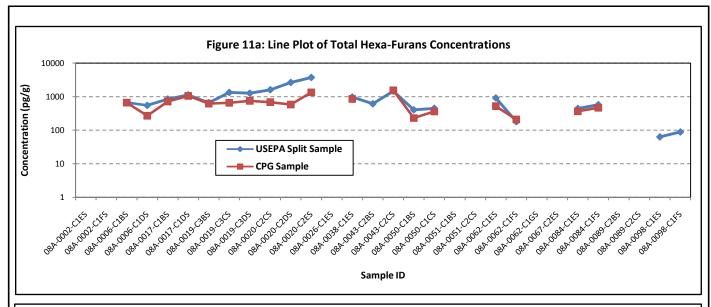


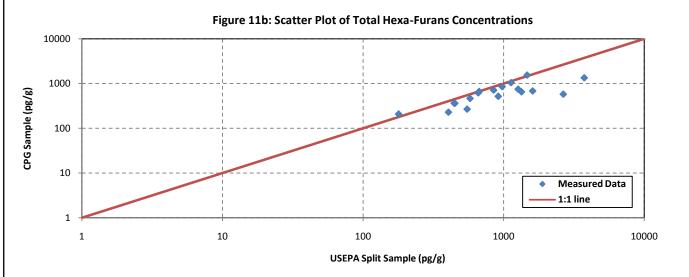


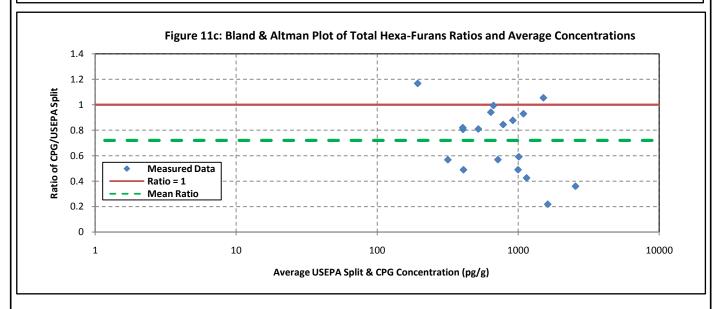




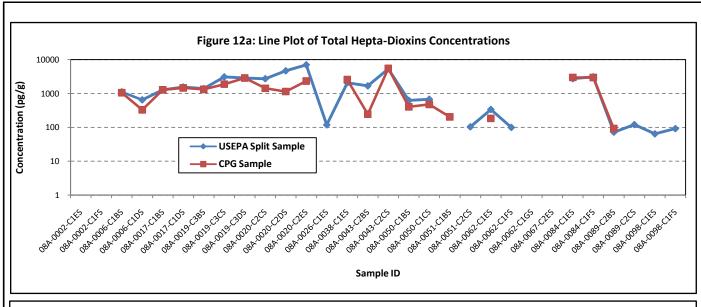


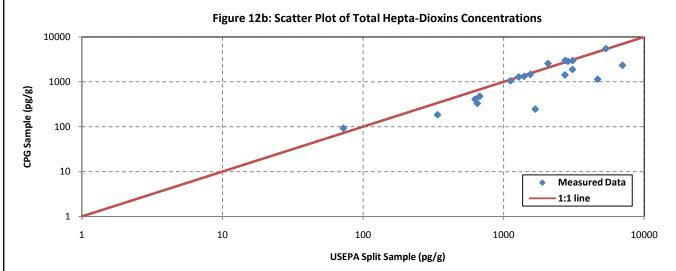


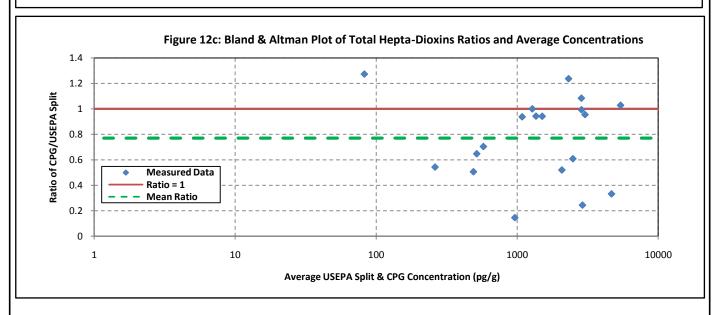




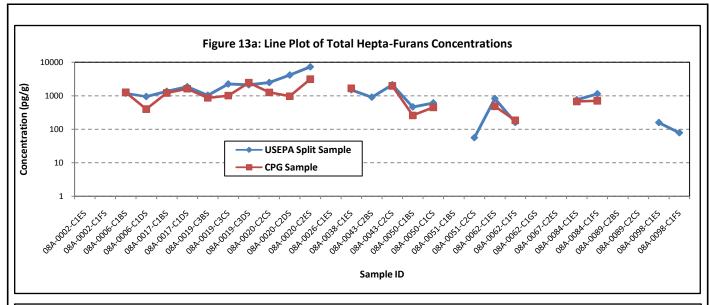


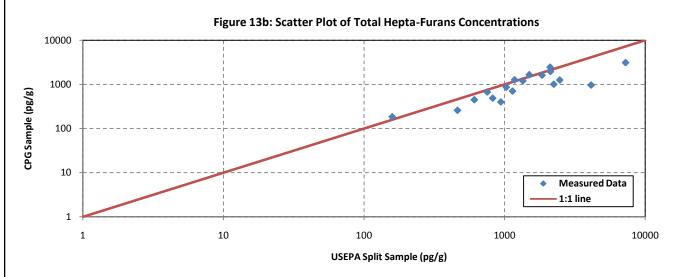


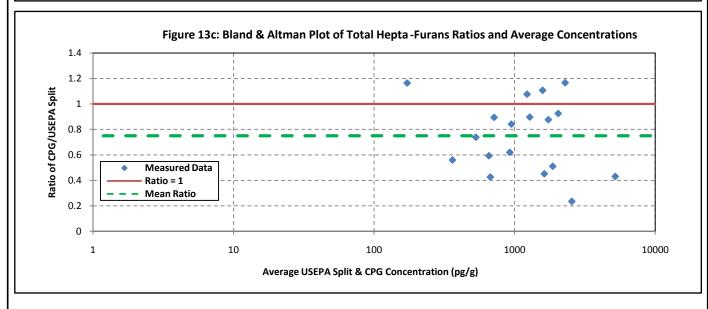




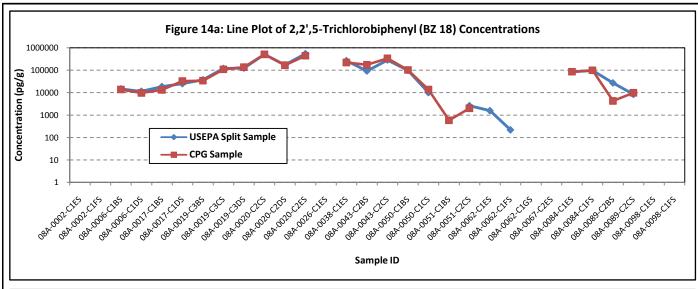


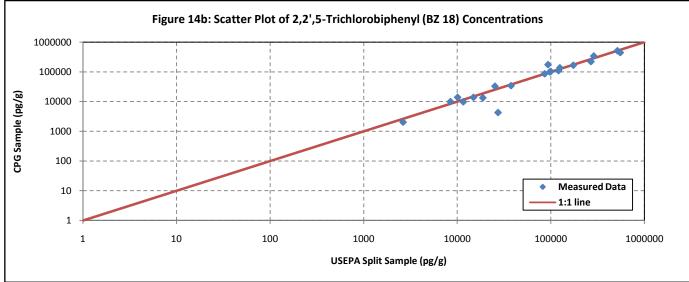


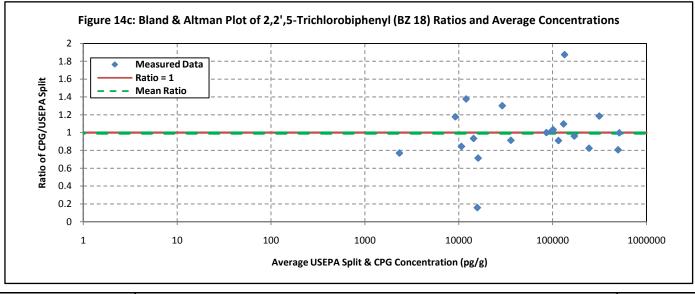




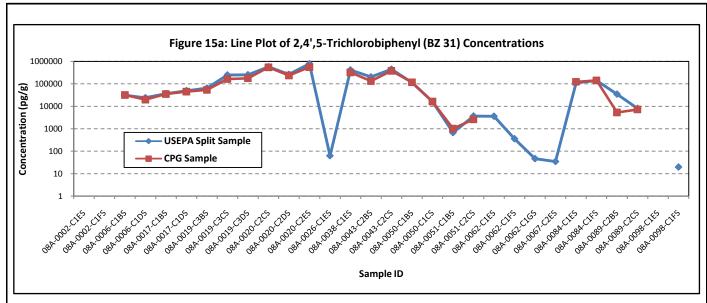


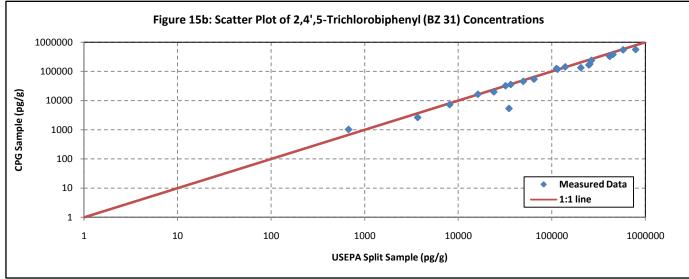


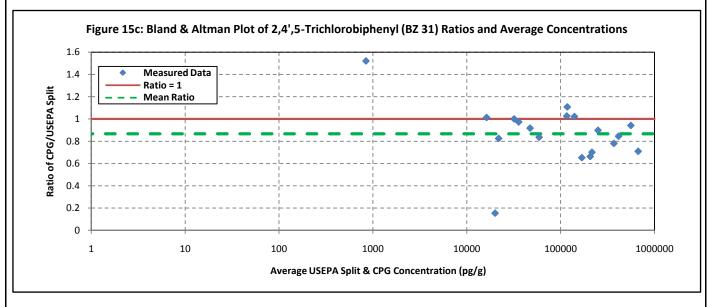






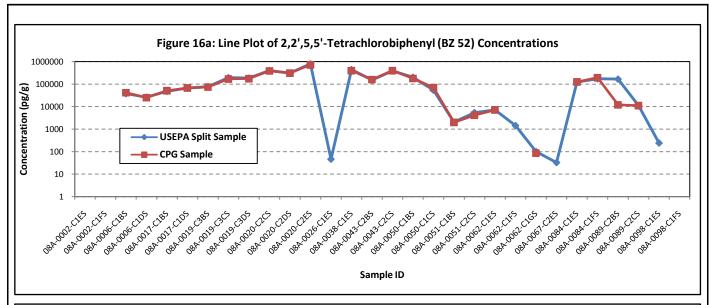


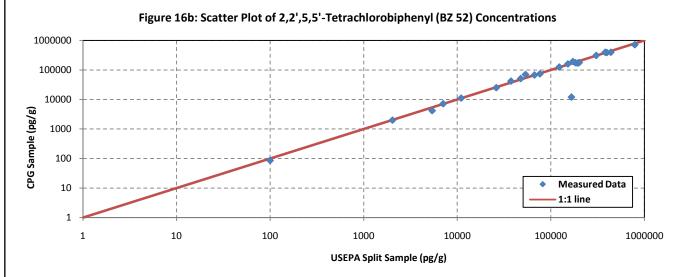


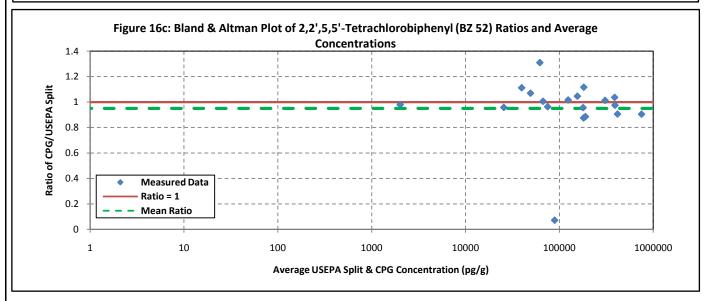




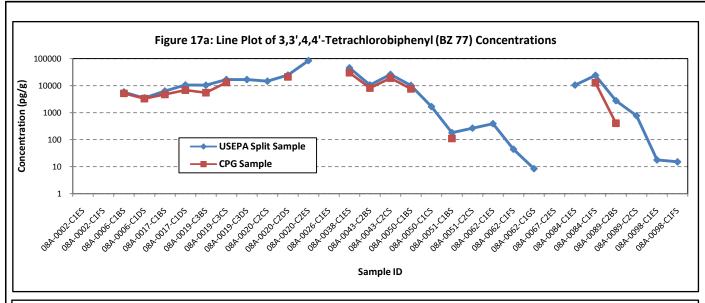


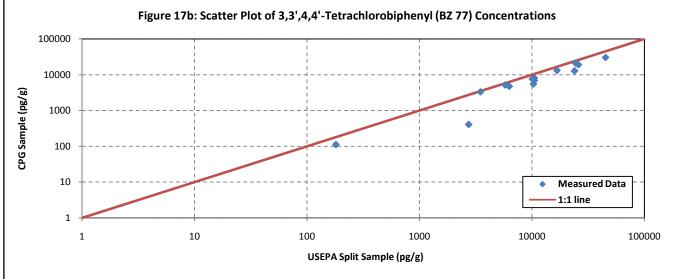


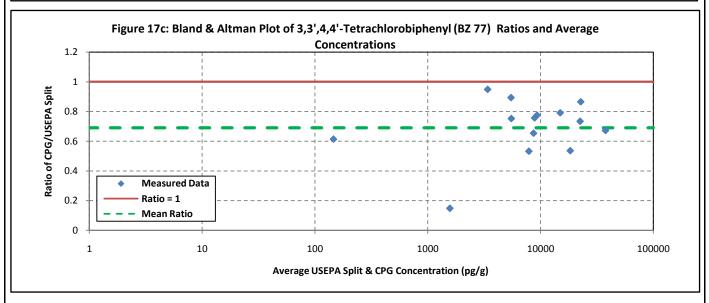




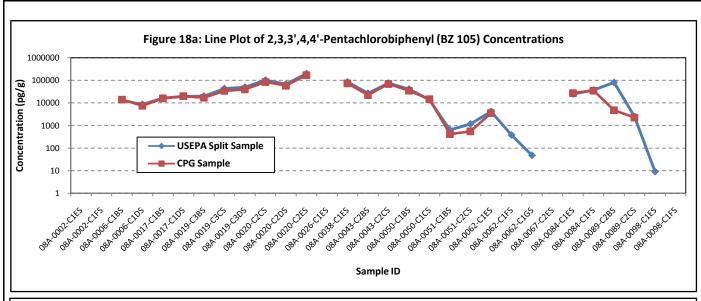


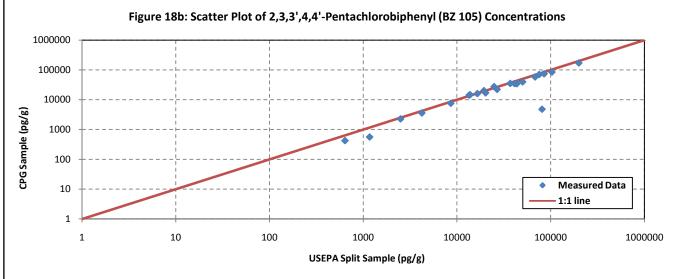


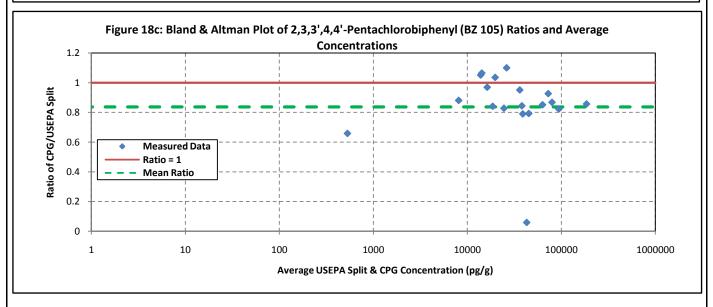




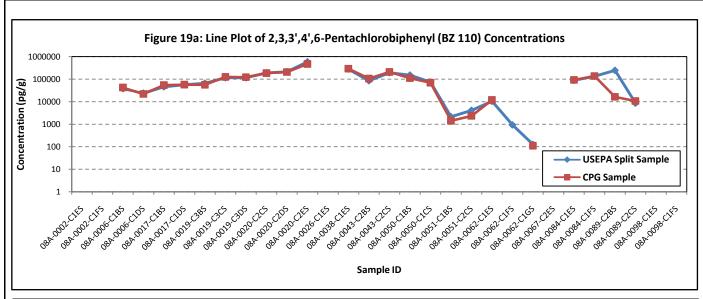


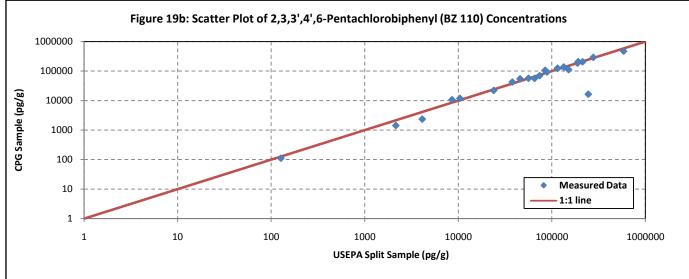


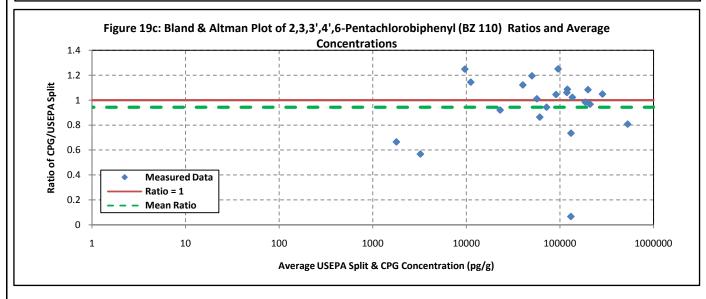






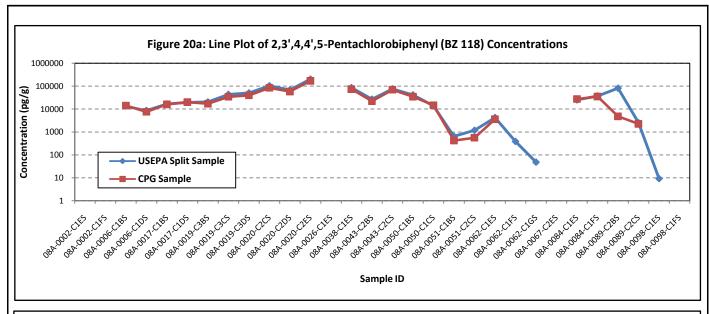


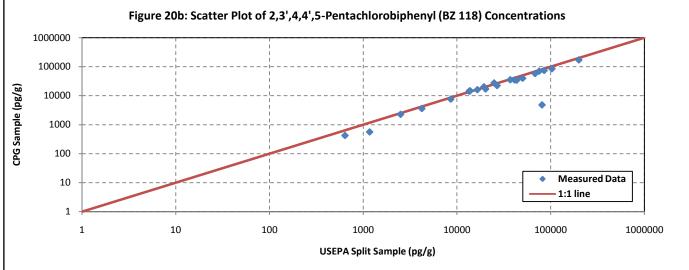


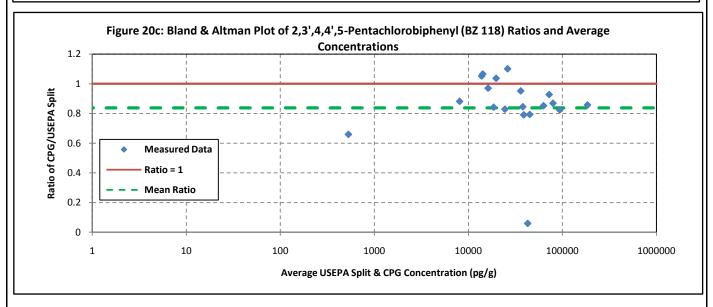






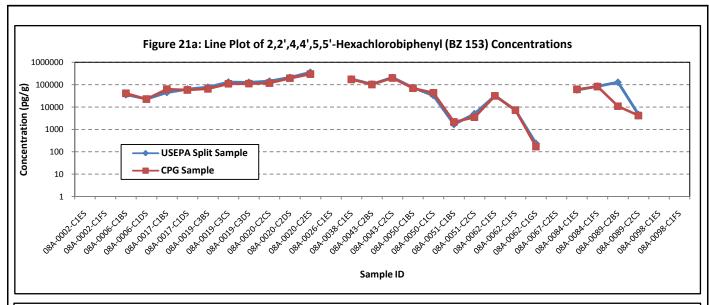


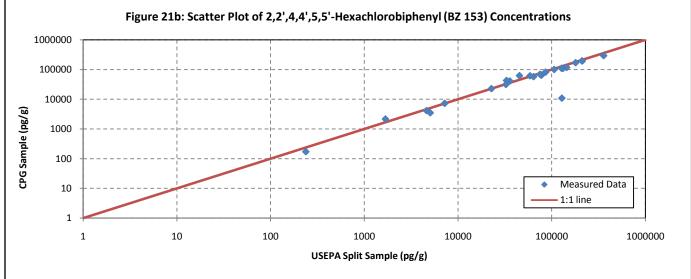


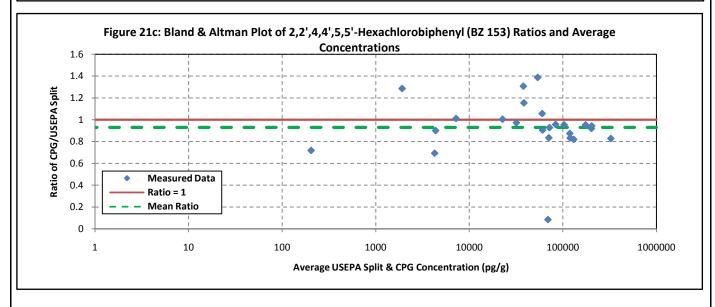




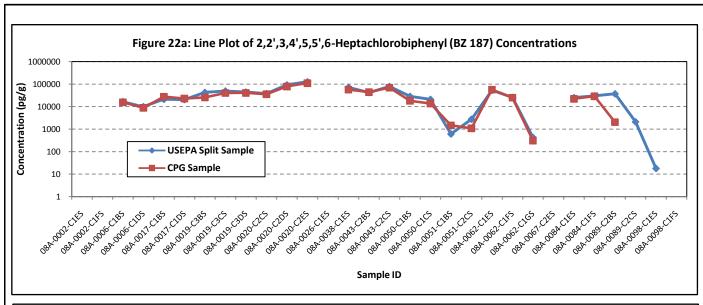


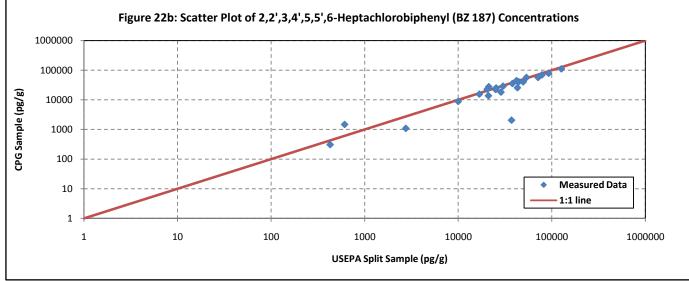


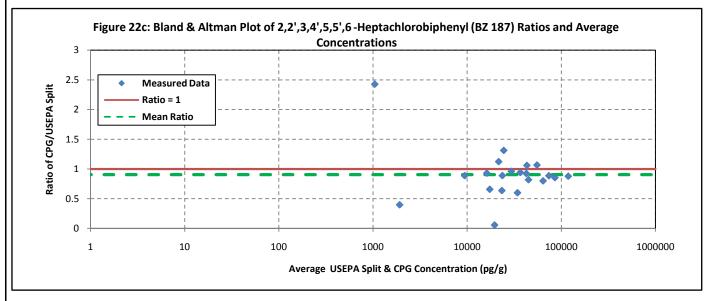




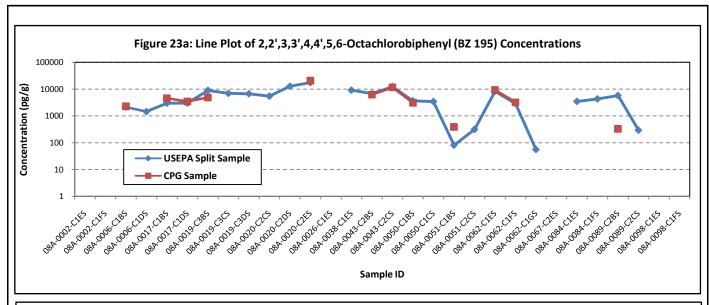


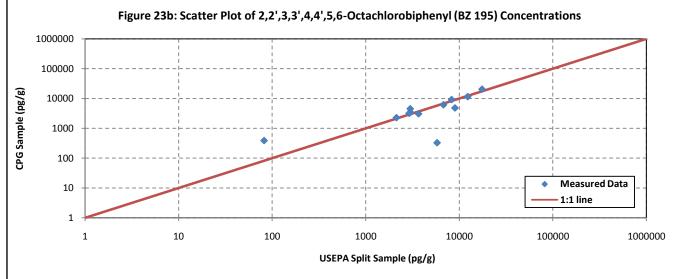


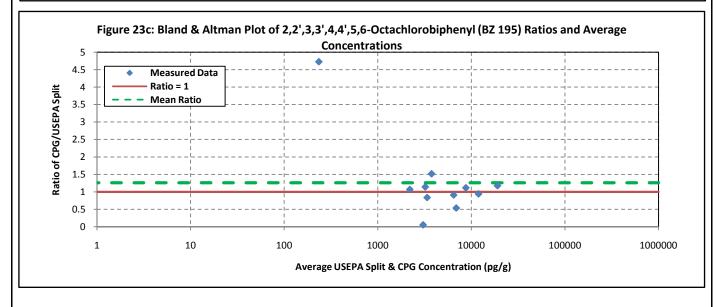




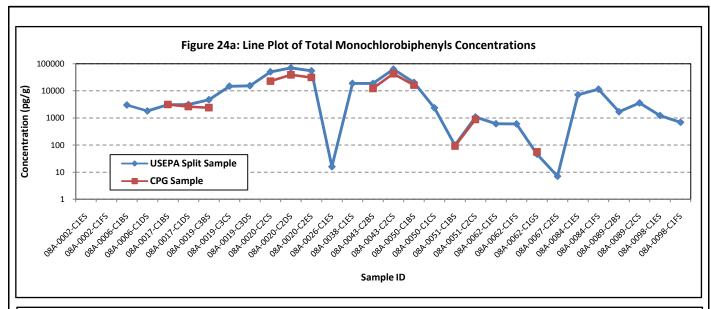


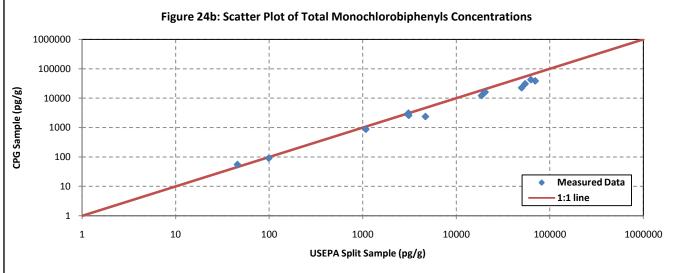


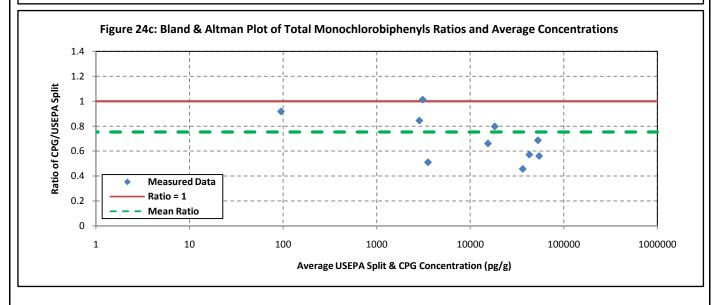




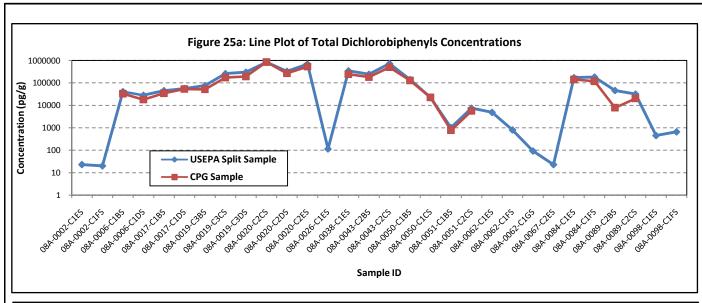


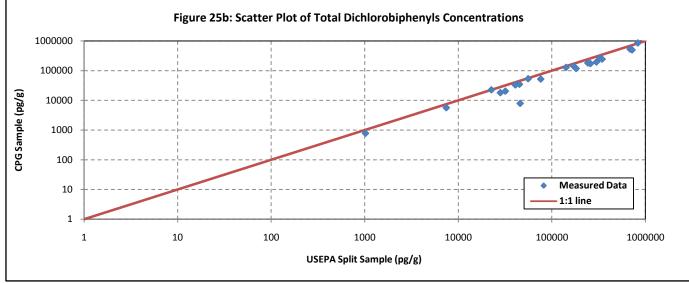


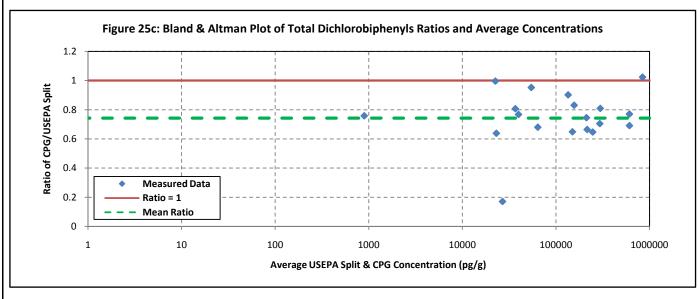






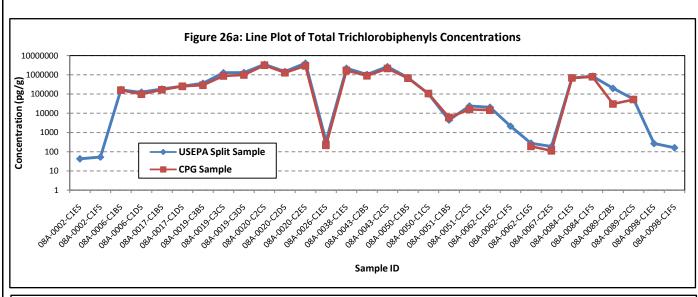


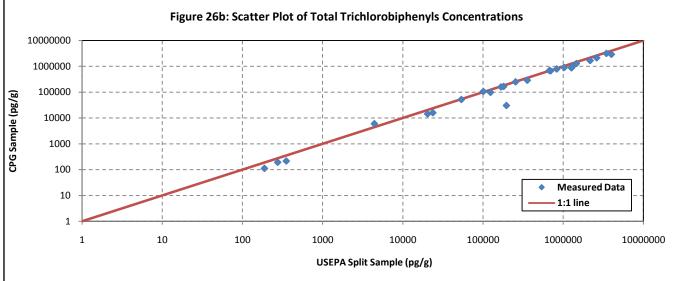


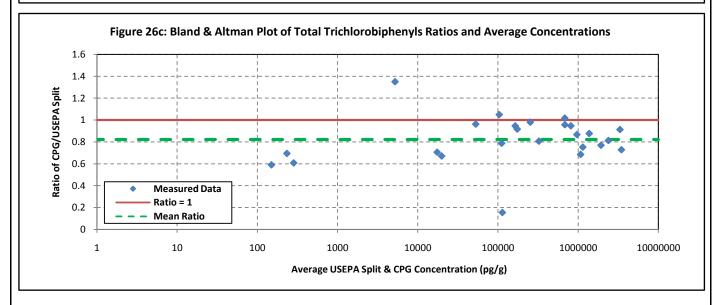






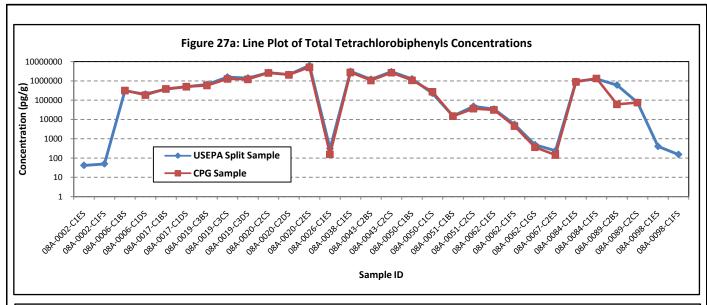


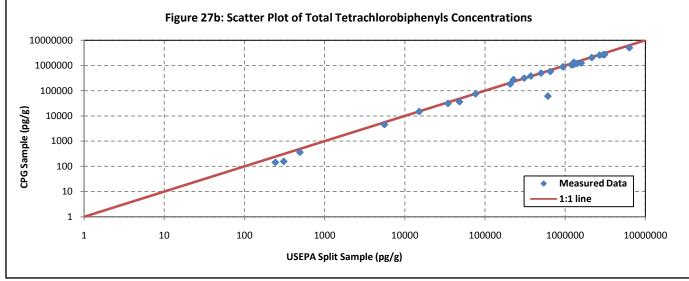


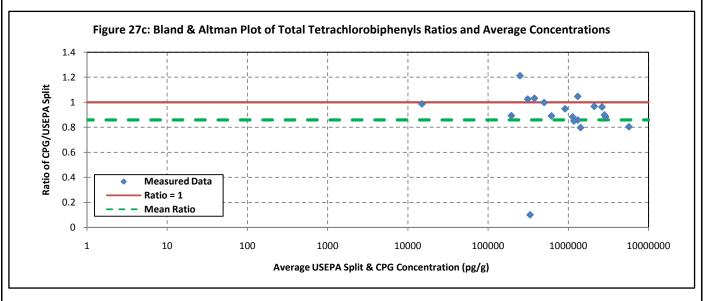




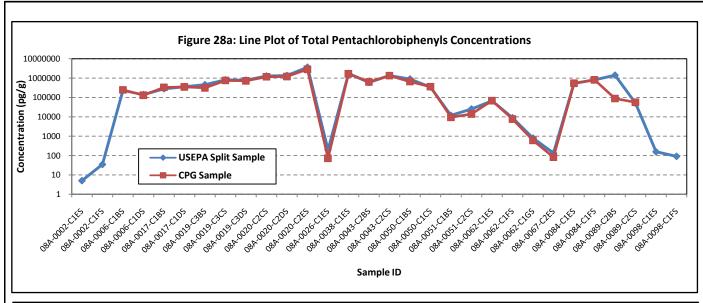


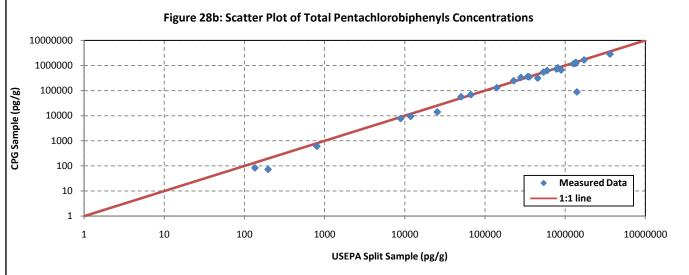


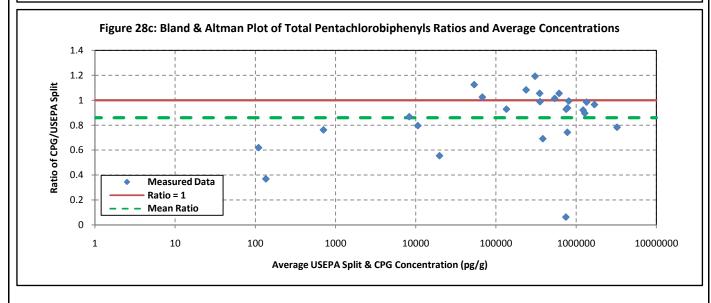






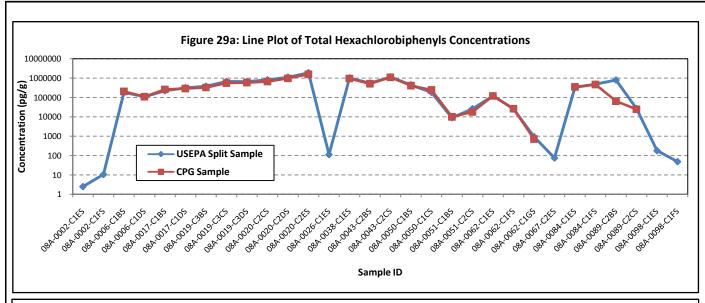


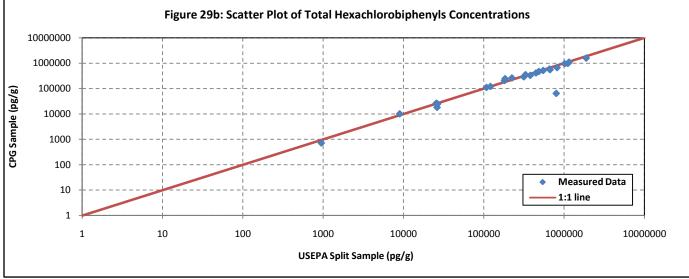


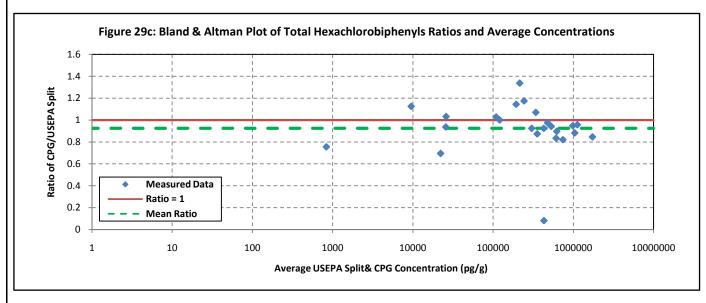






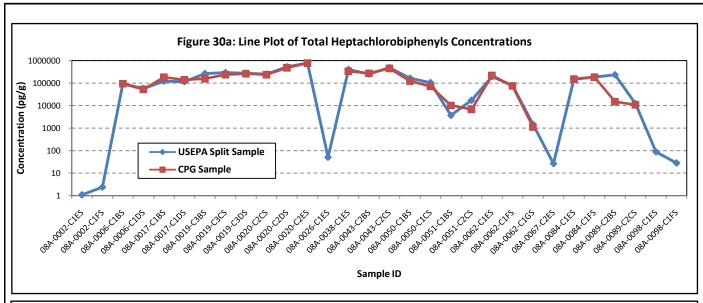


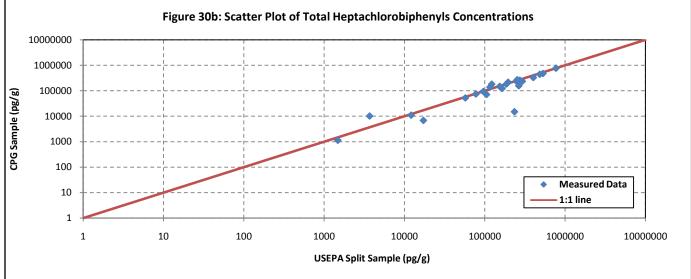


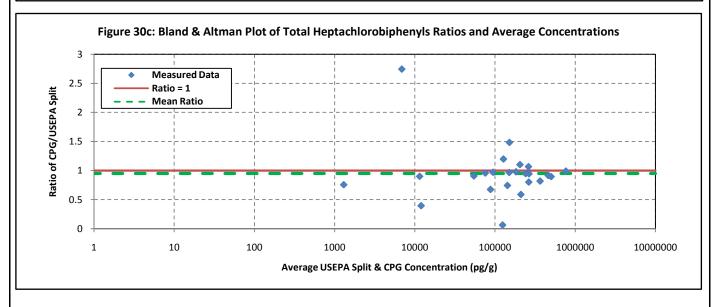




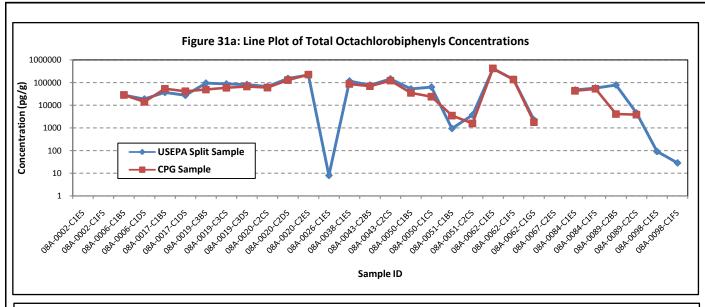


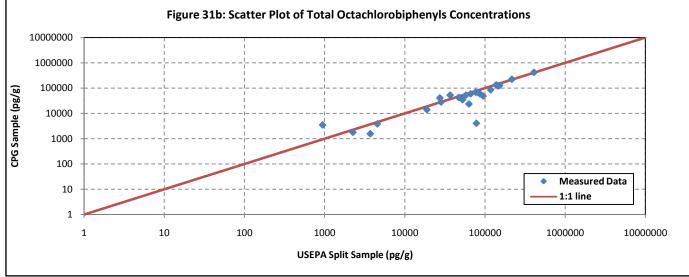


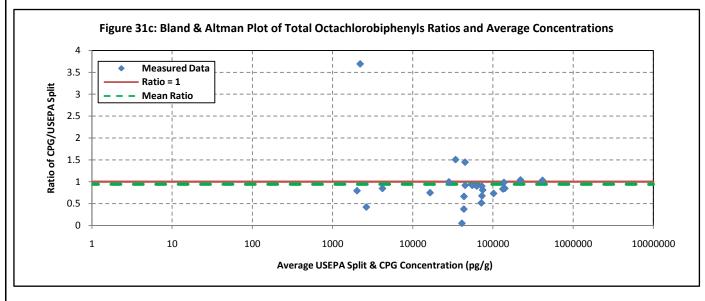




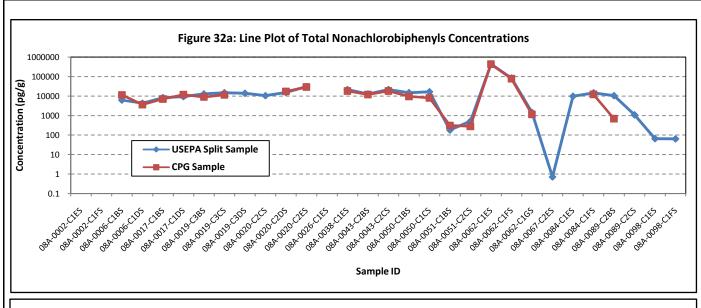


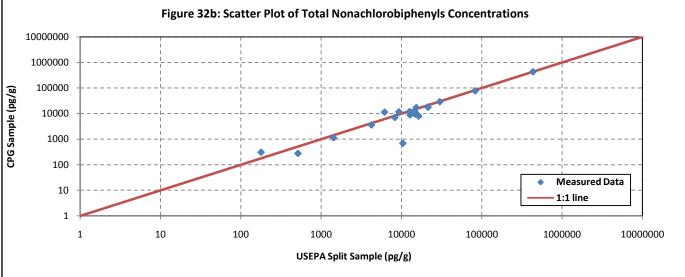


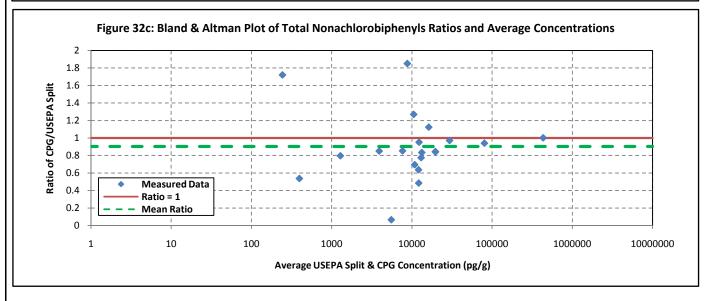




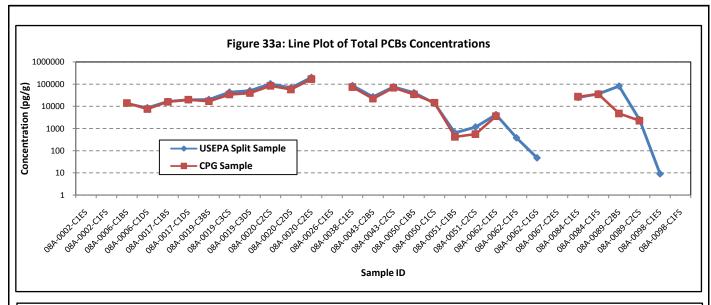


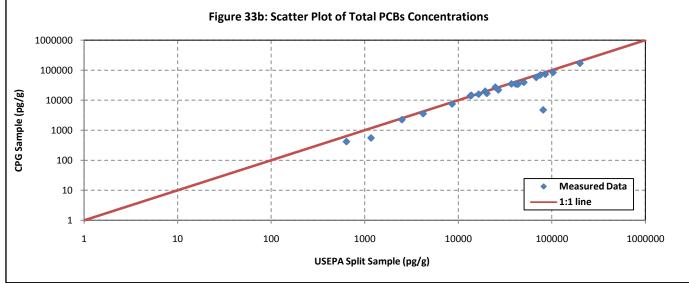


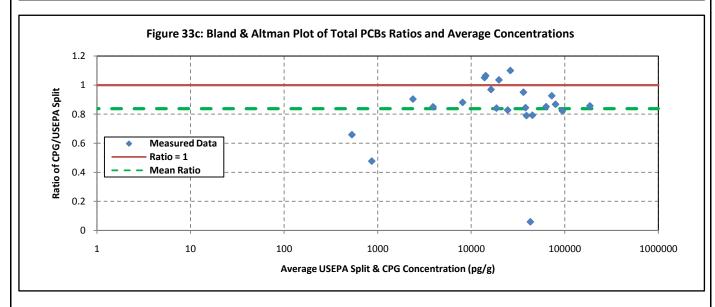




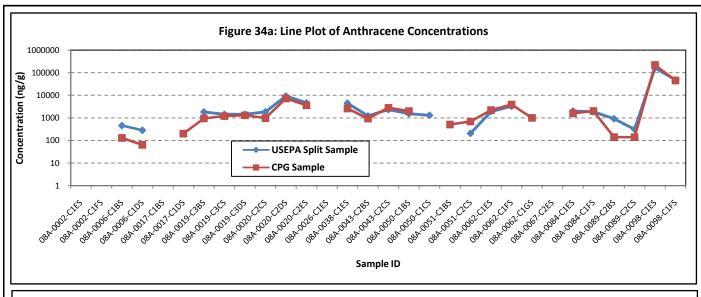


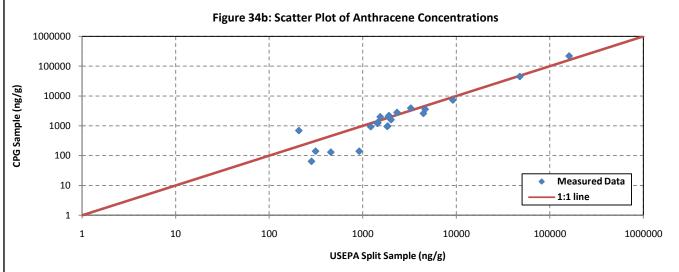


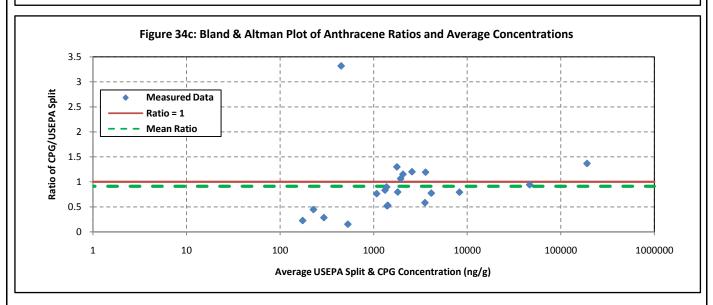




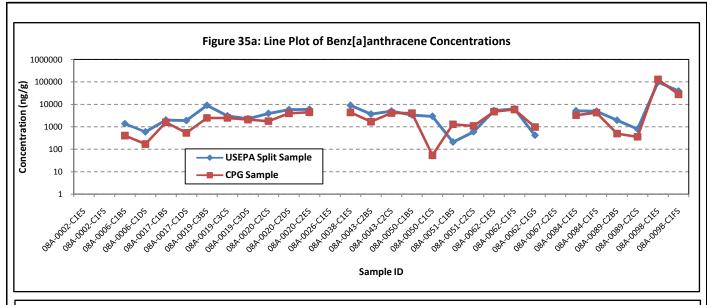


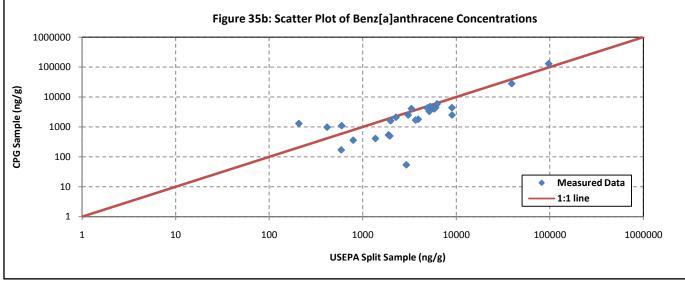


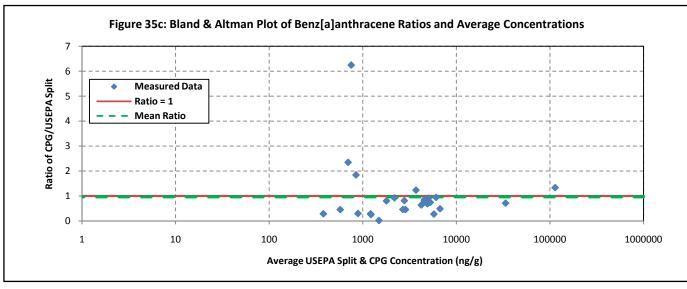




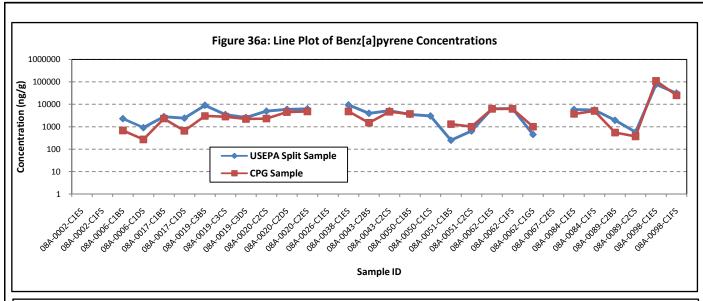


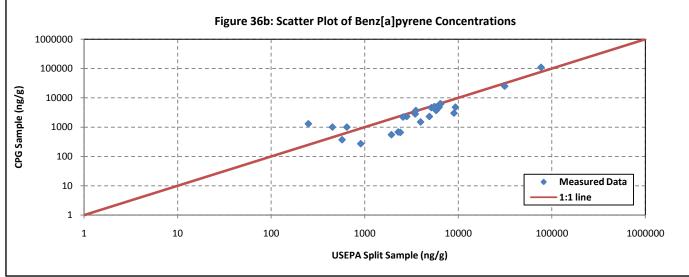


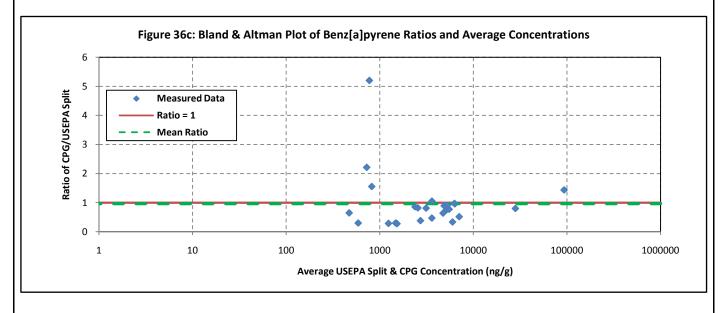




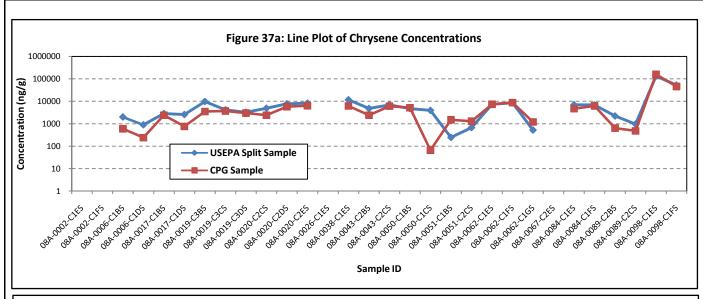


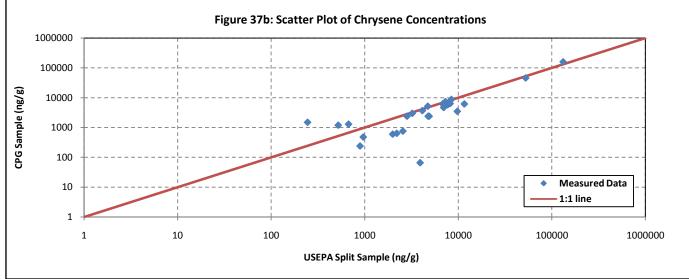


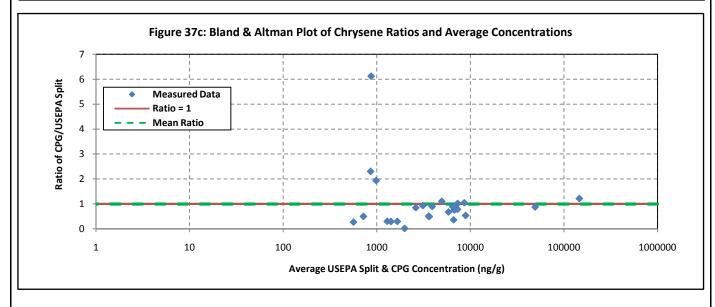






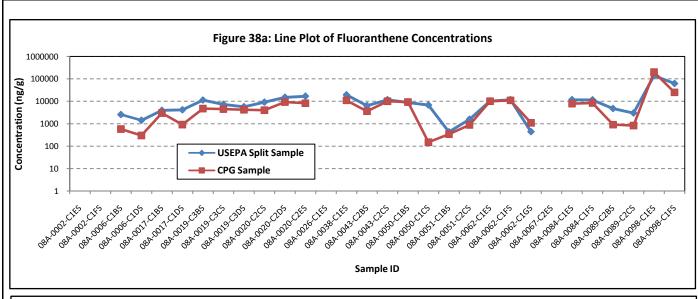


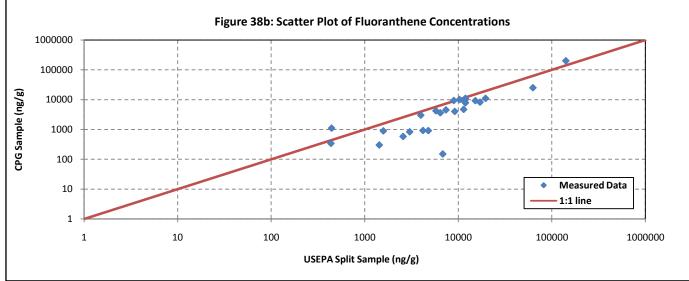


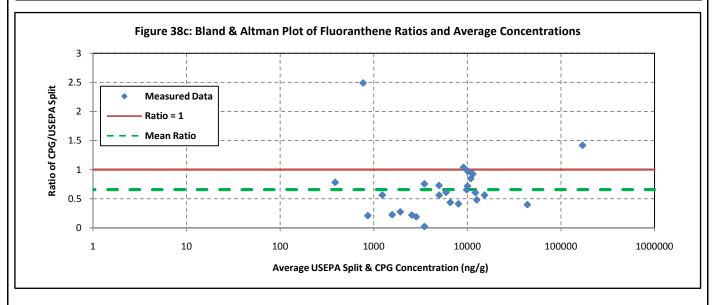






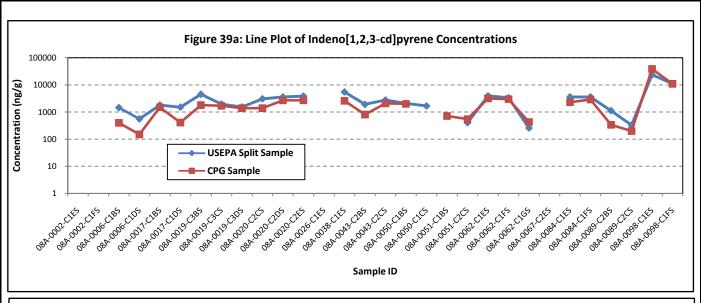


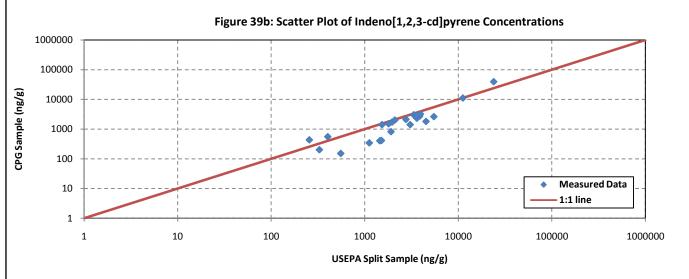


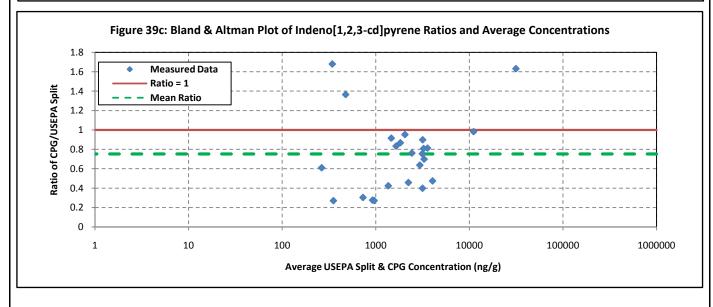




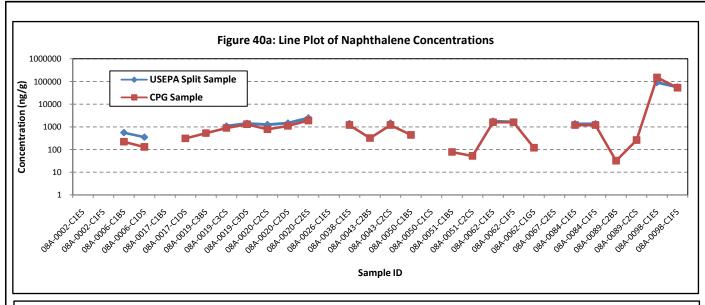


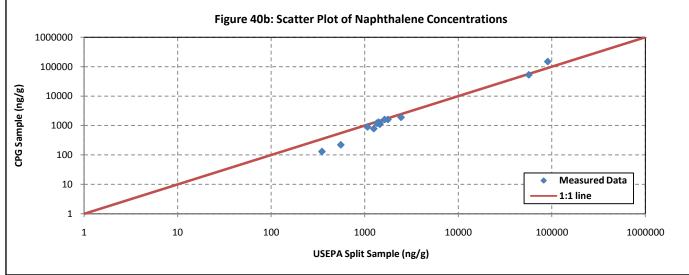


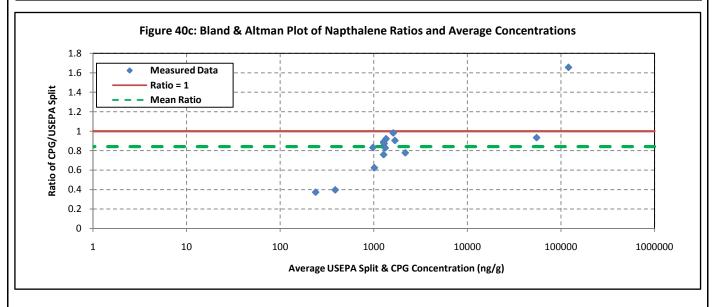




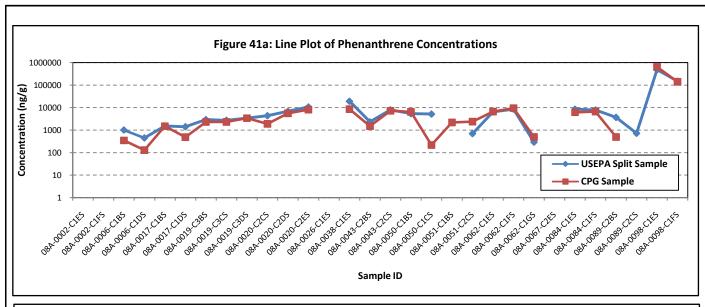


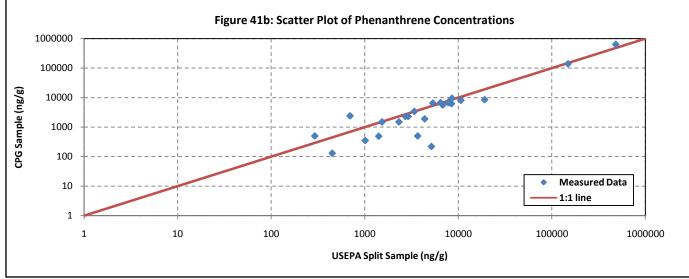


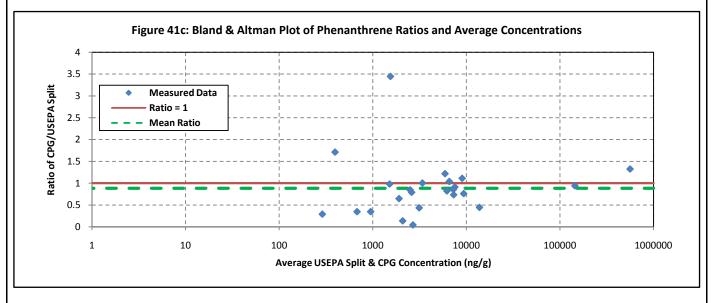




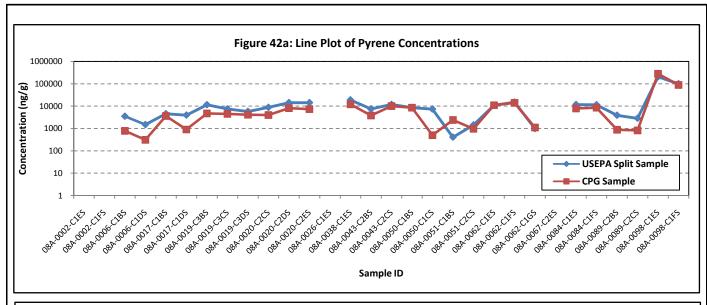


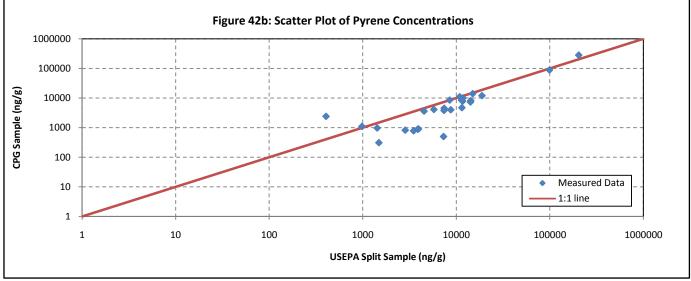


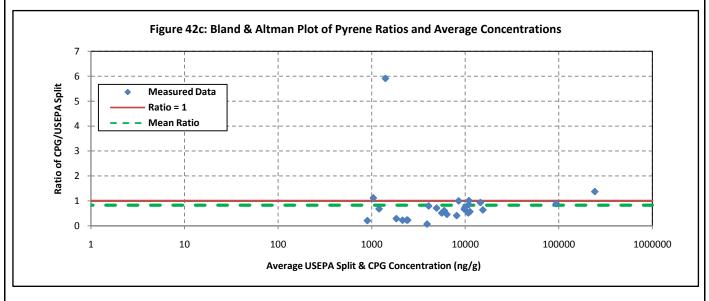




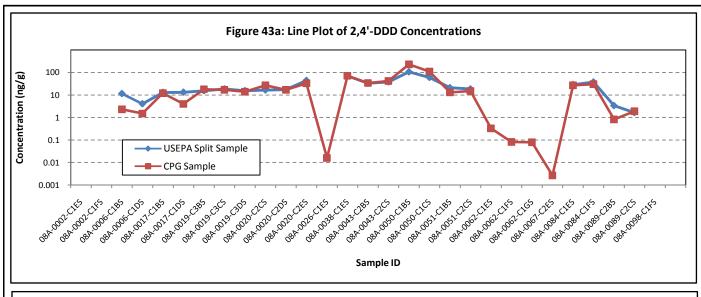


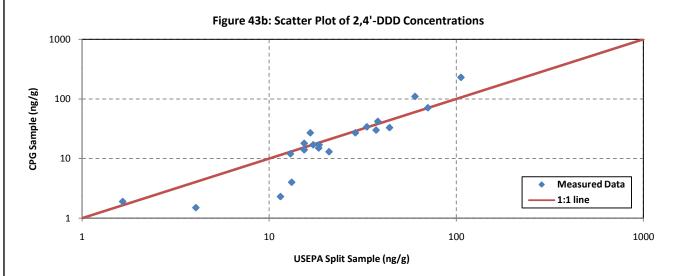


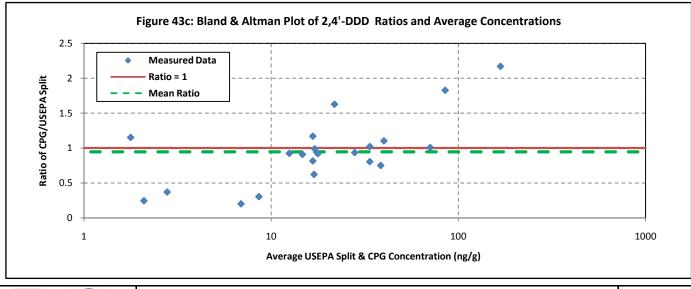




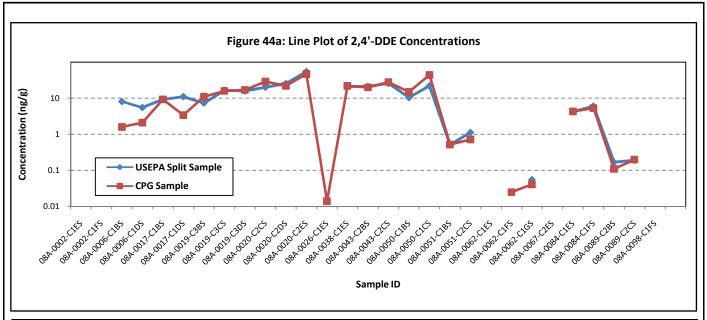


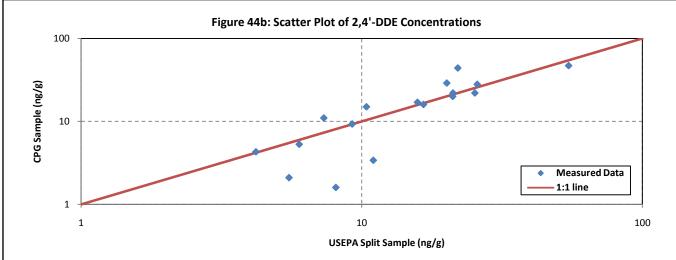


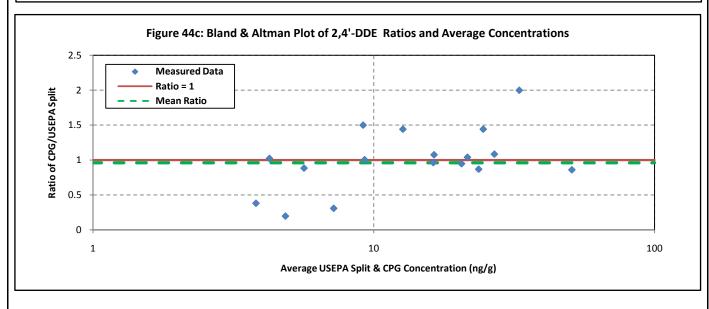




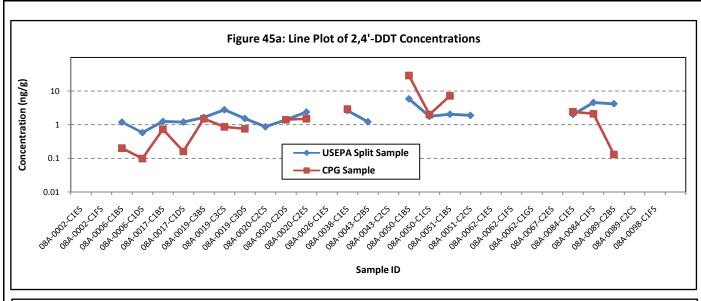


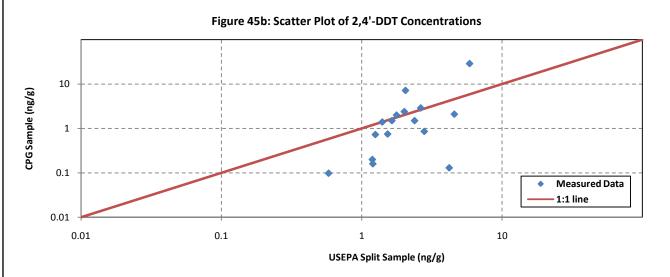


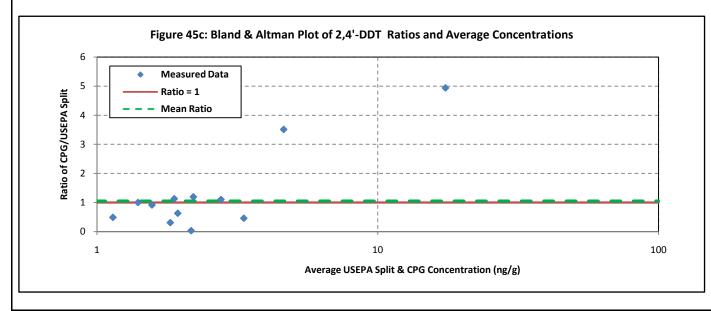


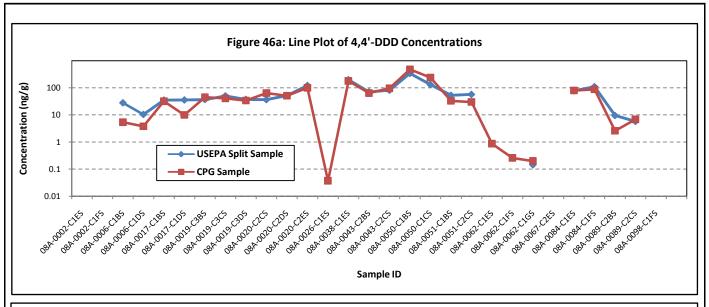


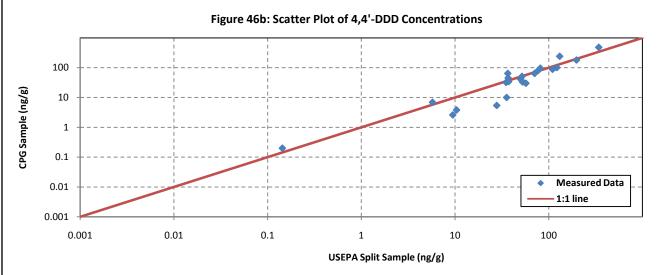


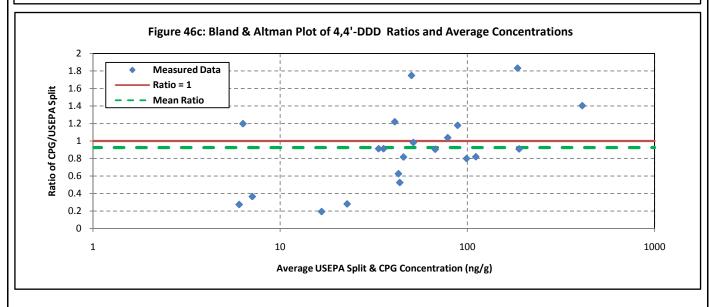




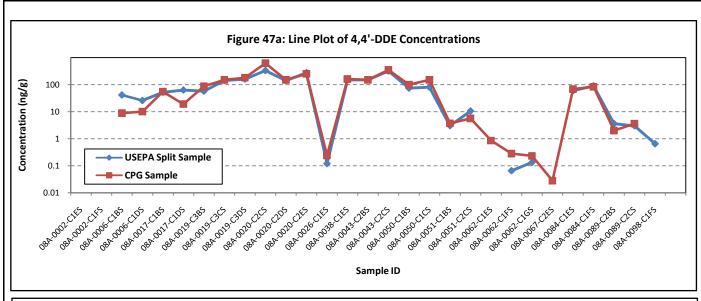


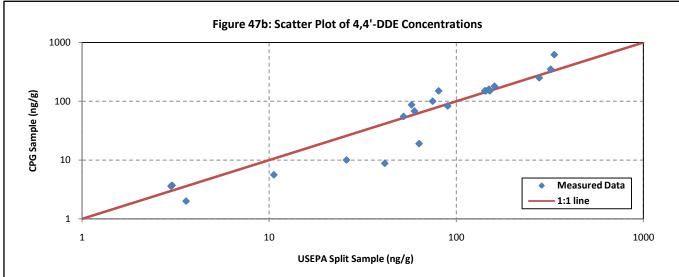


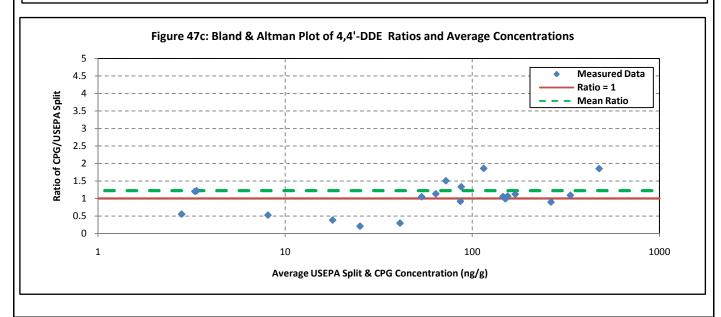




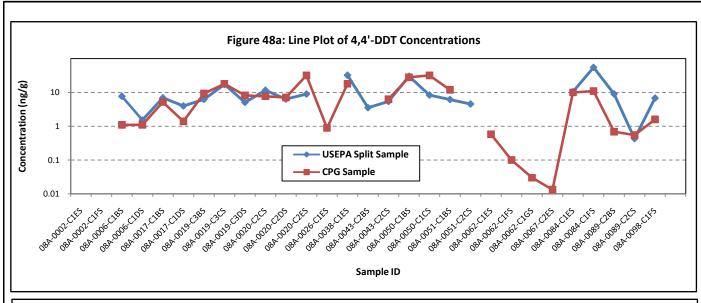


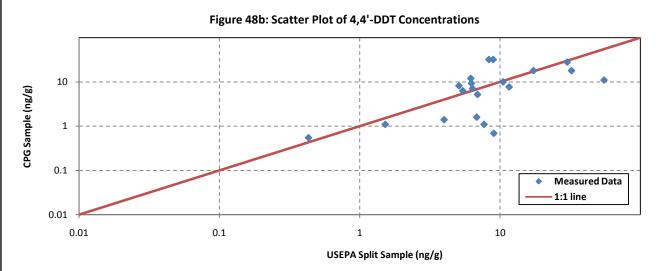


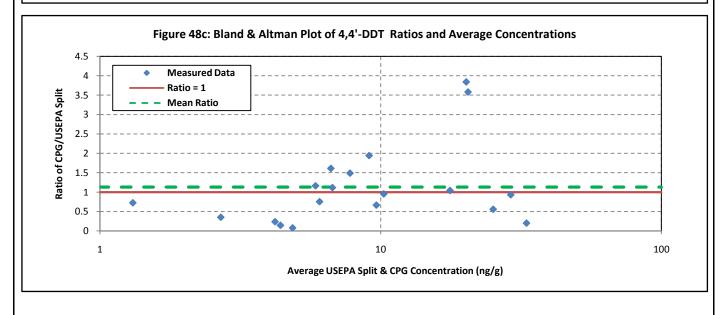




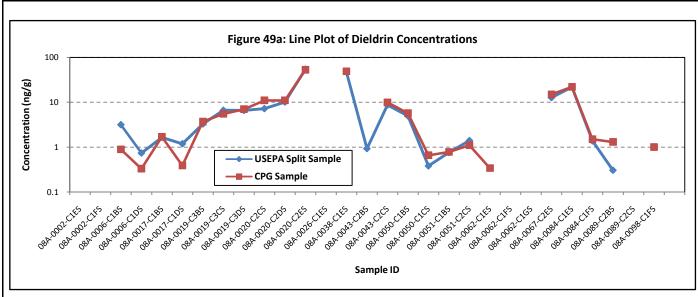


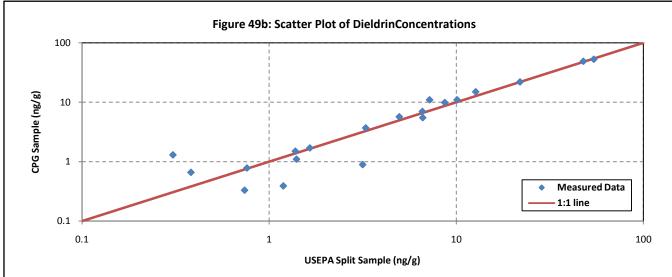


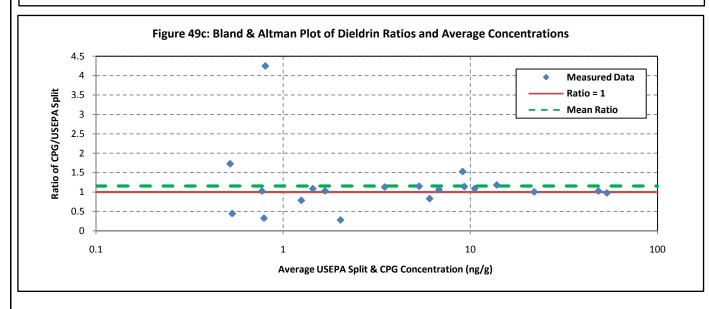




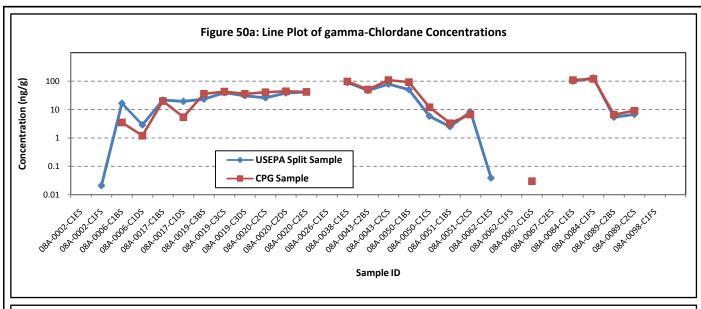


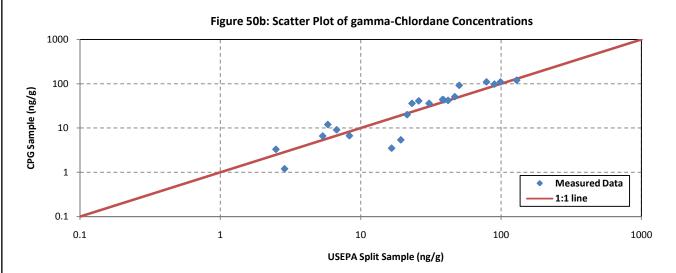


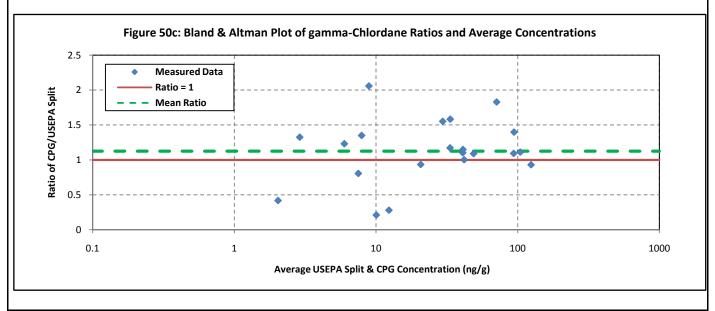




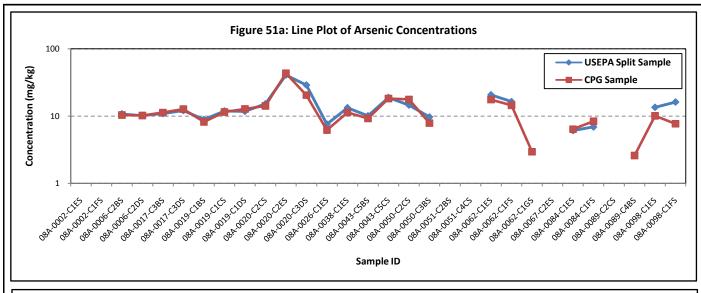


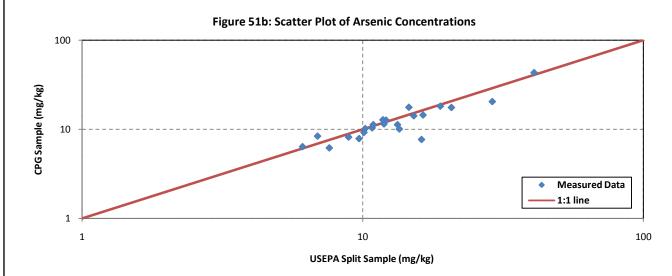


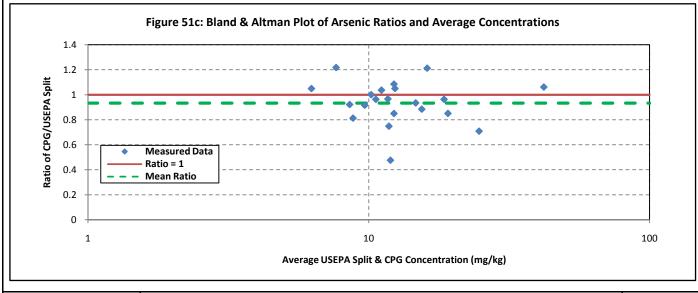




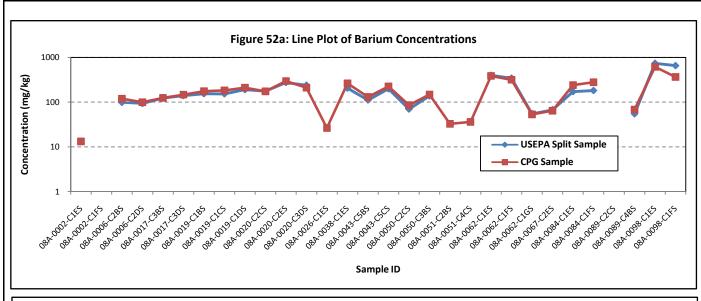


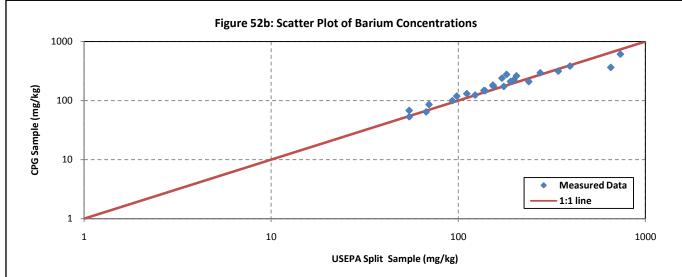


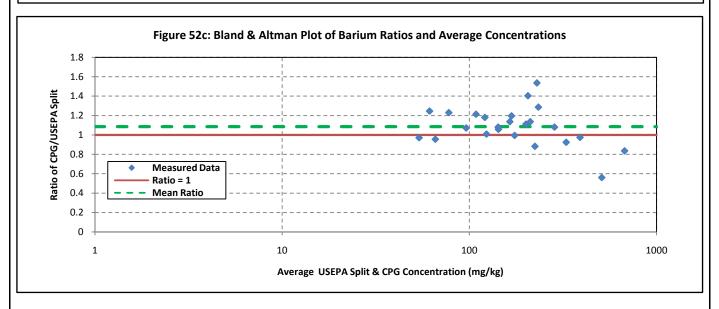




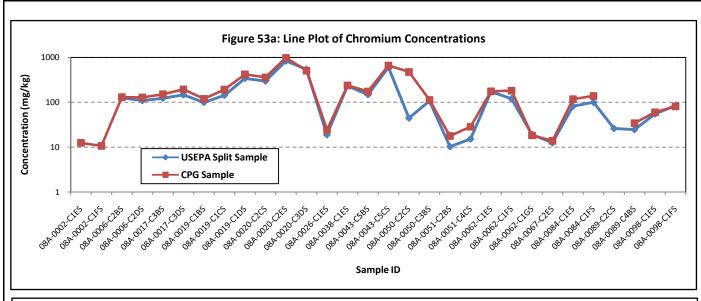


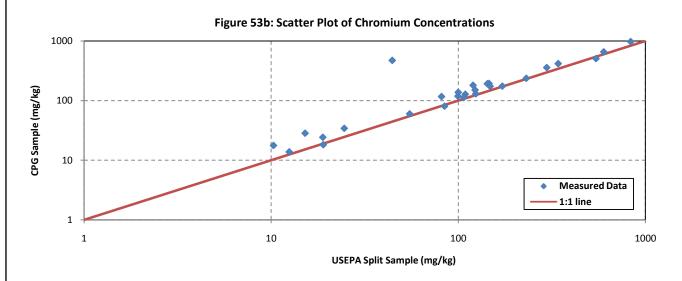


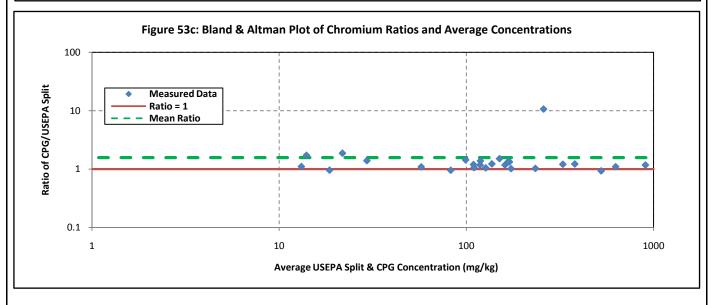




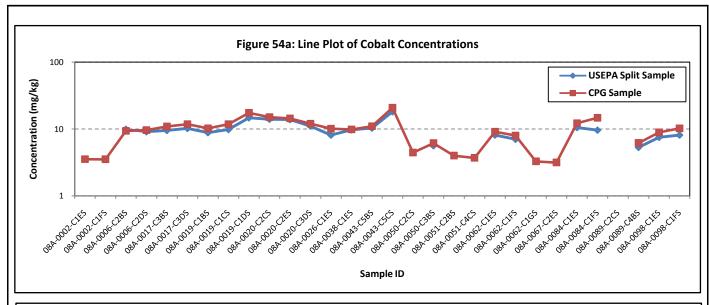


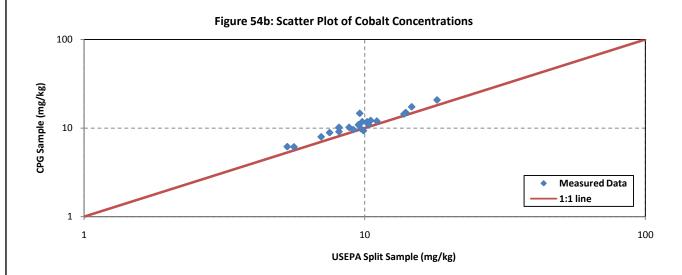


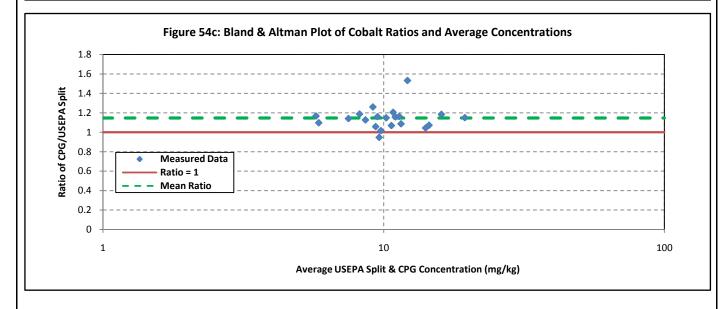




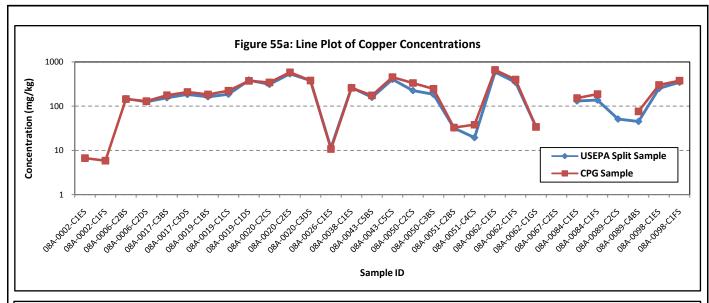


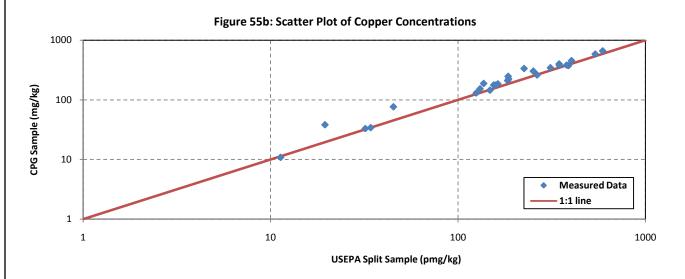


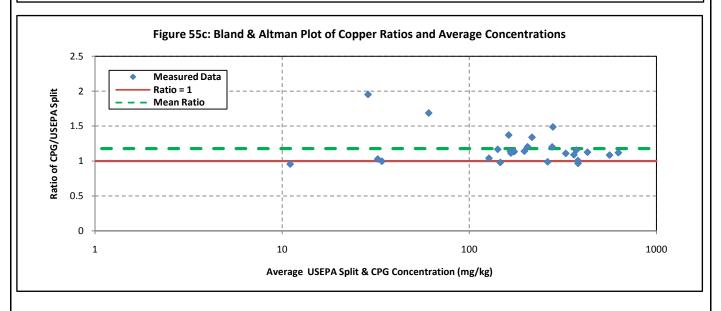




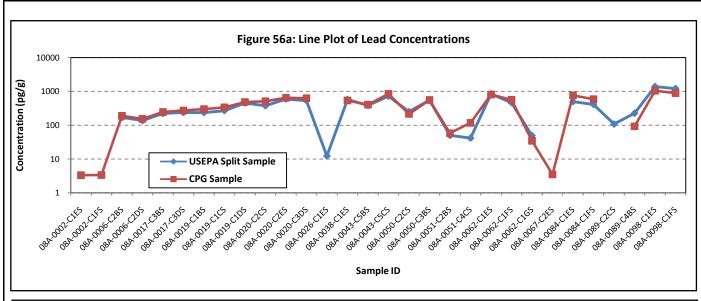


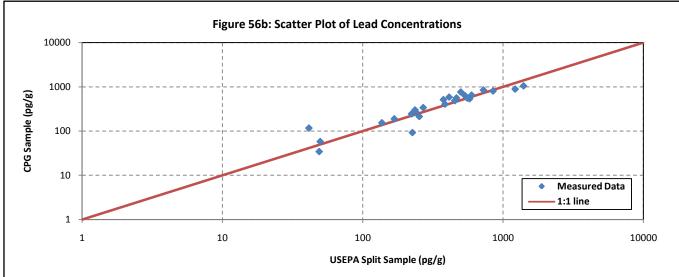


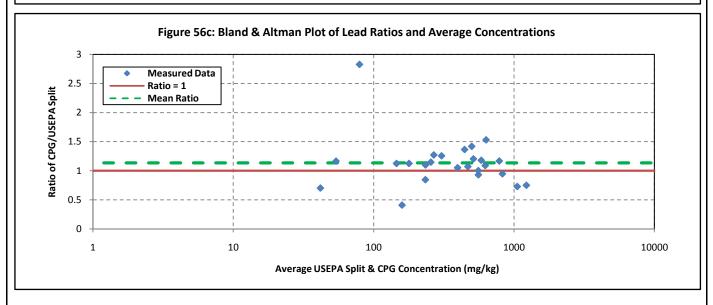




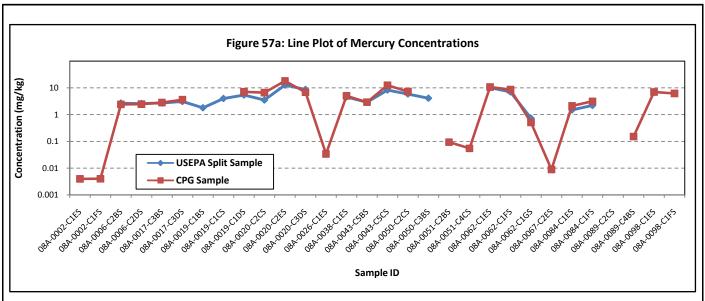


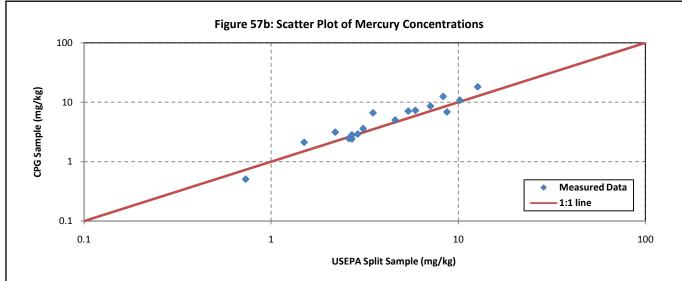


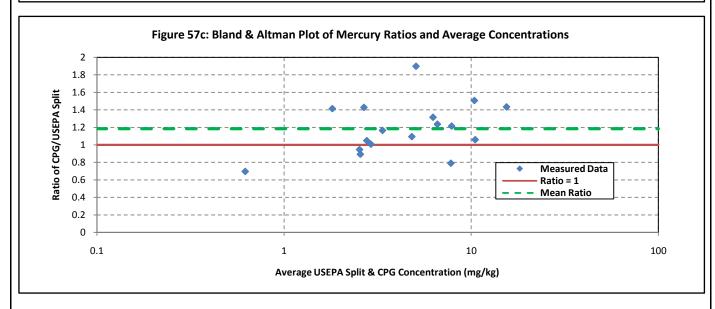




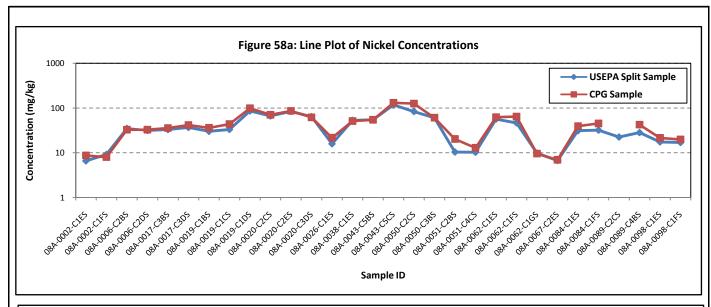


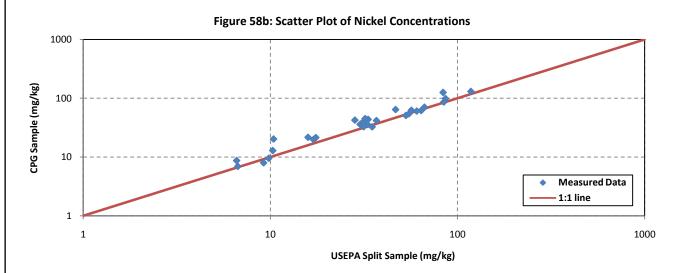


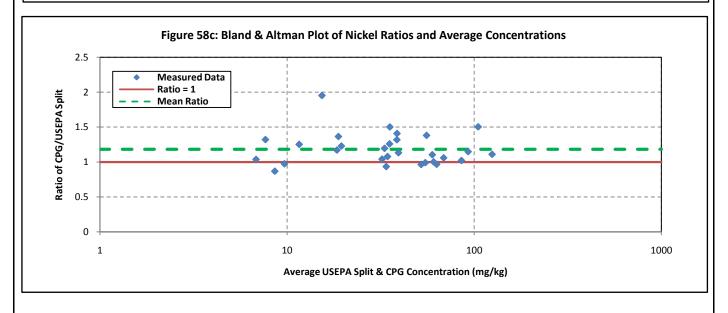




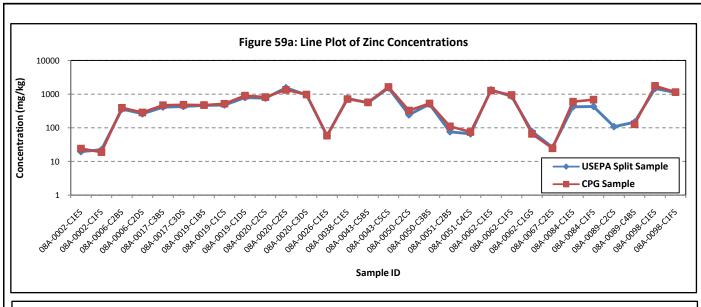


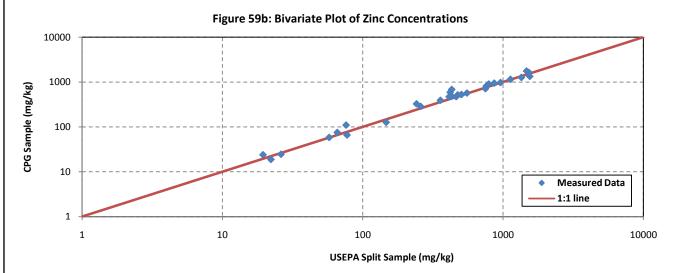


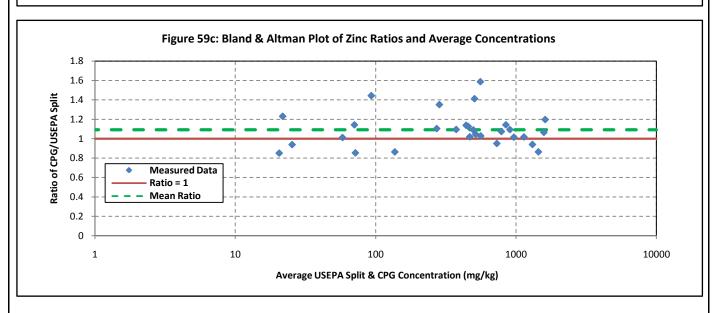






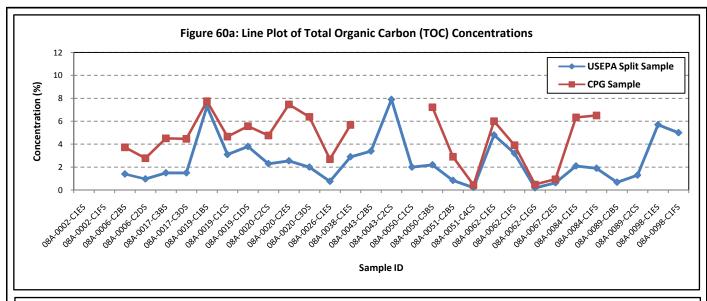


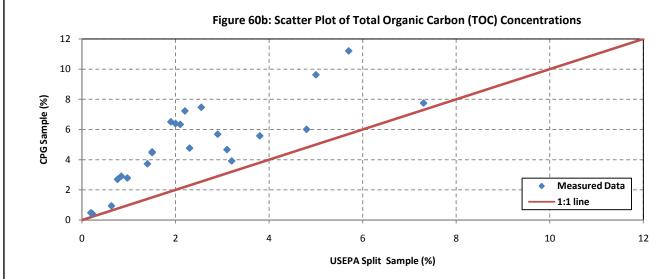


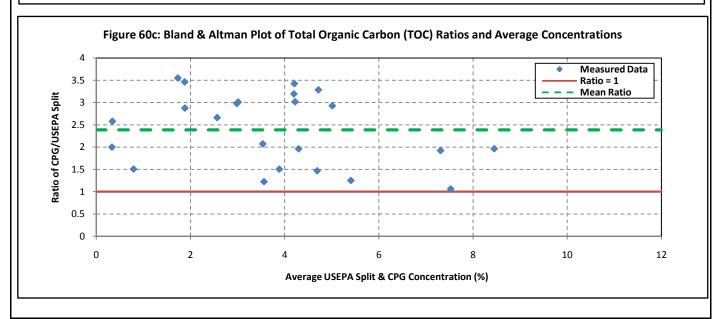
















### **Attachment E**

Independent Investigation Reports (prepared by CSC Environmental Solutions and Interface, Inc., dated March 16, 2010 and January 2011)

Report on Suspected Causes of Disparities between the Results Produced by Columbia Analytical Services and AXYS Analytical Services in Analysis of Lower Passaic River Sediment Split Samples for Chlorinated Dibenzo-p-Dioxins and Dibenzofurans, and Development of a Conversion Factor to Adjust Results between the Two Laboratories

prepared by



Environmental Solutions 6101 Stevenson Avenue Alexandria VA 22304

and

Interface, Inc. P.O. Box 297 Fort Collins, CO 80522

#### **Summary**

This report suggests causes for observed disparities in analytical results produced by Columbia Analytical Services (CAS) and AXYS Analytical Services (AXYS) in analysis of split sediment samples collected in 2008 from the Lower Passaic River. The samples were analyzed by both laboratories using their own modifications to EPA Method 1613B: *Tetra- Through Octa-Chlorinated Dioxins and Furans by Isotope Dilution HRGC/HRMS*. For 2,3,7,8-tetrachlorodibenzo-p-dioxin (2,3,7,8-TCDD; dioxin), sediment concentrations reported by CAS were, on average, approximately one-half the concentrations reported by AXYS. The suspected cause of these disparities is believed to be one or more differences in the extraction techniques used by the laboratories.

In the course of investigating potential causes of the disparities, three sets of split sample data were examined. For analyses of its portion of the splits, AXYS used dehydration with a large amount of sodium sulfate and Soxhlet extraction with an 80:20 toluene:acetone solvent mixture. The procedures used by the other laboratories are as follows:

- 2005 and 2007 samples from Newark Bay Vista Analytical (Vista; formerly Alta Analytical) used the Soxhlet/Dean-Stark (SDS) extractor specified in Method 1613B. Results showed that Vista's SDS procedure extracted approximately 13 percent less 2,3,7,8-TCDD than AXYS' procedure. This difference was statistically significantly different at the 95% confidence level.
- 2008 samples from the Lower Passaic River CAS used dehydration with a relatively smaller amount of sodium sulfate (as compared to AXYS) and Soxhlet extraction with toluene. Results showed that AXYS' procedure extracted approximately twice as much 2,3,7,8-TCDD as the CAS procedure. This difference was statistically significantly different at the 95% confidence level.
- 2009 samples from the Lower Passaic River Analytical Perspectives (AP) used the SDS extractor specified in Method 1613B. Results showed that AP's SDS procedure extracted 7% more 2,3,7,8-TCDD than AXYS' procedure. However, this difference was not statistically significant at the 95% confidence level.

The conclusion from these data is that the AXYS procedure extracts amounts of 2,3,7,8-TCDD equal to or slightly greater than SDS, as practiced by Vista and AP, whereas the CAS procedure extracts approximately half as much. Because the CAS procedure extracts only half as much 2,3,7,8-TCDD as the AXYS procedure, an adjustment of the CAS results, in the form of a "correction factor," may be appropriate. In order to develop a correction factor for the CAS results, the results produced by AXYS must be presumed to be "true values." Application of a correction factor would likely result in some decrease in the systematic error, but would result in an increase in random error. Given this qualification, a correction factor of 0.53 was determined by calculating the geometric mean of the CAS-AXYS ratio of results for 2,3,7,8-TCDD in the 2008 data. This factor is significantly different from 1 at the 95% confidence level. Using this factor, CAS results for dioxin would need to be divided by 0.53 (or multiplied by 1.887) to adjust them to the equivalent AXYS values. Suggested geometric mean correction factors for the other 2,3,7,8-substituted polychlorinated dibenzo-p-dioxins and polychlorinated dibenzo-function (PCDDs/PCDFs) are provided in this report.

Report on Suspected Causes of Disparities between the Results Produced by Columbia Analytical Services and AXYS Analytical Services in Analysis of Lower Passaic River Sediment Split Samples for Chlorinated Dibenzo-p-Dioxins and Dibenzofurans, and Development of a Conversion Factor to Adjust Results between the Two Laboratories

#### Introduction

In October of 2009, Alice Yeh, EPA Region 2, contacted the Office of Water, Engineering and Analysis Division (EAD), Engineering and Analytical Support Branch (EASB) for assistance in finding the reason(s) for disparities in results between Columbia Analytical Services (CAS) and AXYS Analytical Services (AXYS) for determination of 2,3,7,8-substituted polychlorinated dibenzo-*p*-dioxins and polychlorinated dibenzofurans (PCDDs/PCDFs) in split sediment samples from studies in the Lower Passaic River in 2008. CAS analyzed the split samples between August 2008 and April 2009 for a Cooperating Parties Group (CPG) of potentially responsible parties (PRPs). AXYS analyzed the split samples between October 2008 and January 2009 for EPA.

Region 2 requested that EASB help with the following two tasks:

- Attempt to determine a reason or reasons for the systematic bias in the data, and
- If possible and appropriate, provide a correction factor that would allow the full 2008 CAS data set for PCDDs/PCDFs to be adjusted for the disparity.

During a conference call on December 17, 2009, information came to light regarding 2005 and 2007 data on split sediment samples from Newark Bay analyzed by AXYS and Vista Laboratories, and 2009 data on split sediment samples from the Lower Passaic River analyzed by AXYS and Analytical Perspectives (AP). In light of these data, a task was added to determine if results of analyses of the 2005/2007 Newark Bay and 2009 Lower Passaic River sediment samples would aid in resolving disparities in results of analyses of the 2008 Passaic River sediment samples. In the end, they did.

EASB assigned these tasks to its contractor, Computer Sciences Corporation (CSC), who in turn, requested assistance from its subcontractor, Interface, Inc. CSC and Interface, Inc. are collectively referred to in this report as "CSC" or "we."

In October and November of 2009, Region 2 provided results of analyses of the 2008 Lower Passaic River split sediment samples, standard operating procedures (SOPs) from CAS and AXYS, and various supporting data. After review of these initial data, CSC developed a list of questions and requests to be forwarded to CAS through CPG and to AXYS through Region 2. Throughout much of November and into early December of 2009, CSC received further SOPs, data, and responses to questions and initiated additional requests for information from both CAS and AXYS. In February of 2010, CSC received results of analyses of the 2005/2007 Newark Bay and 2009 Lower Passaic River split sediment samples.

The remainder of this report describes CSC's examination of the information supplied by Region 2, CAS, and AXYS, provides CSC's beliefs as to the cause of the disparities, and suggests correction factors for the CAS data.

#### **Investigation of Possible Causes of the Disparity**

Comparison of Laboratory SOPs with EPA Method 1613B

Method 1613B includes various options for extraction of PCDDs/PCDFs from environmental matrices including sediments, cleanup procedures for removing interferences, and high resolution (capillary column) gas chromatography combined with high resolution mass spectrometry (HRGC/HRMS)

determinative procedures for the 17 2,3,7,8-substituted PCDD/PCDF congeners. Method 1613B is not attached to this report but is available at the EPA web site:

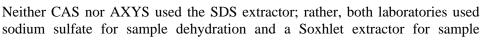
http://www.epa.gov/waterscience/methods/method/dioxins/1613.pdf

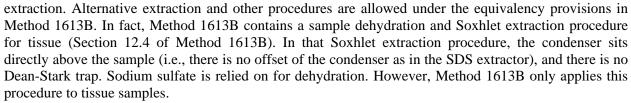
Both laboratories modified the procedures in EPA Method 1613B and incorporated those modifications into the SOPs used for the analyses of the split samples from the site.

#### Soxhlet/Dean-Stark Extraction

In thinking about how CAS could obtain results that tended to be lower, though by varying amounts, than those obtained by AXYS, CSC concluded that the most likely problem was in the extraction or cleanup steps. A disparity in results in the determinative step (HRGC/HRMS) would likely cause a more consistent bias. Therefore, CSC focused on differences in the extraction and cleanup steps between the laboratories' SOPs and Method 1613B. Most noticeable was the extraction technique used for the sediment samples. Method 1613B specifies use of a Soxhlet/Dean-Stark (SDS) extractor, shown to the right.

The SDS technique relies on formation of a vapor-phase azeotrope between the extraction solvent toluene and water leached from the sample. As the solvent passes through the sample in the Soxhlet portion of the extractor, it removes the water, allowing the toluene to extract the PCDDs/PCDFs from the matrix. The toluene/water mixture boils in the flask below the sample and the azeotropic vapor rises through the apparatus to a condenser at the top. The azeotrope is broken when the condensed liquid falls into the Dean-Stark trap and forms two layers, with the toluene on top of the water. The water and toluene collect in the Dean-Stark trap until the toluene reaches the top of the trap and overflows onto the sample. The toluene percolates through the sample carrying the PCDDs/PCDFs into the boiling flask. The SDS procedure does not require addition of a dehydrating agent to wet sample matrices such as sediments or soils. Dehydration occurs via the azeotropic distillation.

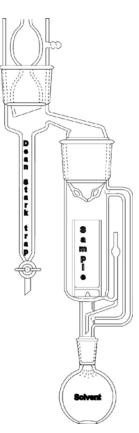




For analyses of the 2005/2007 Newark Bay and 2009 Lower Passaic River samples, AXYS used the same modifications to Method 1613B that were used for analyses of the 2008 Lower Passaic River sediment samples. For the 2005/2007 Newark Bay samples, Vista used Method 1613B as written, including SDS extraction, and for the 2009 Lower Passaic River samples, AP used Method 1613B as written, including SDS extraction.

### Recoveries of <sup>13</sup>C-labeled PCDDs/PCDFs and <sup>37</sup>Cl-labeled 2,3,7,8-TCDD

Method 1613B requires that isotopically labeled standards be added to each sample and sample extract. A suite of fifteen <sup>13</sup>C-labeled PCDDs/PCDFs are added (spiked) into each sample prior to extraction. These labeled PCDDs/PCDFs do not occur naturally and are used to quantify the unlabeled target analytes through a technique known as isotope dilution. One other labeled standard, <sup>37</sup>Cl<sub>4</sub>-2,3,7,8-TCDD,



is added to each extract prior to cleanup and is used to diagnose problems with the various extract cleanup steps in the method. CSC examined the recoveries of both sets of labeled standards in all of the samples from both laboratories.

Recoveries of the <sup>37</sup>Cl-labeled cleanup standard in the split samples were within the quality control (QC) acceptance criteria in Method 1613B and consistent across both laboratories. The observed recoveries eliminated inconsistent cleanup as a possible cause of the disparities and led us to focus on extraction.

As with the cleanup standard, recoveries of the <sup>13</sup>C-labeled PCDDs/PCDFs spiked into the samples before extraction were also recovered within expected ranges. However, in development of the SDS technique, Nestrick and Lamparski of the Dow Chemical Company (see References 6 and 7 in EPA Method 1613B) cautioned that compounds spiked onto the surface of a wet solid sample were often easily recovered, whereas PCDDs/PCDFs indigenous to the sample were not so easily recovered because they were more intimately associated with the sample matrix. Thus, labeled compounds recoveries should not be used as the sole measure of performance of a modified method.

Activated, Powdered, Anhydrous Sodium Sulfate

Method 1613B and other environmental analytical methods specify use of powdered sodium sulfate for drying of the sample, and granular sodium sulfate for drying of the sample extract.

Removal of water from the sample prior to extraction is necessary to allow the extraction solvent to enter the pores of the soil/sediment particles and the interstices between them. Compared to the coarser granular form, the small particle size of the powdered form of sodium sulfate allows the drying agent to be mixed well with the sample and permits intimate contact with the soil or sediment particles so that any water can be removed. Therefore, Method 1613B and nearly all other methods that employ dehydration and Soxhlet extraction specify use of baked, powdered, anhydrous sodium sulfate for sample dehydration.

The granular form of sodium sulfate is used in Method 1613B and other analytical methods for removing water from sample extracts. Section 7.2.1 of Method 1613B describes procedures for preparing the granular sodium sulfate used for such extract drying. The procedures in Section 7.2.1 require rinsing the sodium sulfate with methylene chloride, baking at 400 °C for 1 hour minimum to remove any sorbed water to ensure it is anhydrous, cooling in a desiccator, and storage in a clean glass bottle with screw cap that prevents moisture from entering.

The specifications for powdered sodium sulfate are found in Section 7.2.2 of Method 1613B. Because both forms of sodium sulfate (granular and powdered) can be prepared using the same procedures, Section 7.2.2 references the procedure in Section 7.2.1.

In reviewing SOPs from CAS and AXYS, we found that neither laboratory rinsed the sodium sulfate with methylene chloride. We also found that AXYS baked the sodium sulfate at a temperature of 325 °C for 8 hours, whereas CAS used the sodium sulfate as received, without baking. Further, both AXYS and CAS used granular anhydrous sodium sulfate, in contrast to the requirement to use powdered, anhydrous sodium sulfate in Method 1613B and in other methods that use sodium sulfate for dehydration (e.g., EPA's Contract Laboratory Program SOW DLM02.0 *Multi-Media*, *Multi-Concentration Dioxins and Furans Analysis*). The differences among the Method 1613B procedure for tissue and the procedures in the CAS and AXYS SOPs are summarized in Table 1.

The use of granular sodium sulfate by AXYS, rather than powdered, may have been offset by use of the much larger amount of sodium sulfate (75 - 100 g) than the amount used by CAS (5 - 10 g), and the amount specified for use in the extraction procedure for tissue in Method 1613B (40 - 50 g for a 10-g sample). Other contributing factors to the higher concentrations of PCDDs/PCDFs measured by AXYS, relative to the concentrations measured by CAS, may be the use of a toluene:acetone (80:20) co-solvent

mixture by AXYS, rather than toluene alone used by CAS and specified in Method 1613B, and a drying time of 30 min after the sodium sulfate had been mixed with the sample by AXYS, but not by CAS.

Table 1. Comparison of Soxhlet Extraction in Method 1613B and the Procedures used by CAS and Axys\*

Item	EPA Method 1613B Tissue Procedure	CAS Sediment Procedure	Axys Sediment Procedure
Solvent	toluene	toluene	toluene:acetone 80:20
Sodium sulfate			
Type	powdered	granular	granular
Amount	30 - 40 g for 10 g sample	5 - 10 g for 3 g sample	75 - 100 g or until a free flowing powder for 10 g sample
Baking temperature	400 °C for 1 h	none (used as received)	325 °C for at least 8 h
Supplier	Baker, or equivalent	EMD Chemicals	Baker
Drying time	12 - 24 h	none	30 min

<sup>\*</sup>Details of other EPA methods that use sodium sulfate and Soxhlet extraction for dioxins/furans:

EPA SW-846 Method 8290A uses 10 g of powdered sodium sulfate for a 10-g sample, but requires adding more to achieve a free-flowing powder. Sodium sulfate is baked at 400 °C for 4 h. No drying time before extraction is specified. Method 8290A explicitly allows the use of the SDS extractor for soil/sediment, noting that sodium sulfate is not required when it is used. EPA Superfund Contract Laboratory Program Statement of Work (SOW) DLM02.0, May 2005, uses 30 - 40 g of powdered sodium sulfate for a 10-g sample and specifies a dry, free-flowing powder with no drying time before extraction. Sodium sulfate is baked at 400 °C for 4 h.

#### Likely Effects of the CAS Modifications to Method 1613B

We speculate that CAS' use of granular sodium sulfate, lack of baking of the sodium sulfate, use of a smaller relative amount of sodium sulfate, and/or lack of a drying period, led to reduced concentrations of 2,3,7,8-TCDD and other PCDDs/PCDFs relative to the results from AXYS for the split samples. We emphasize that this speculation has not been proved because neither CAS nor AXYS performed the analysis with and without these modifications on the same sample at the same time, or used the SDS extractor. However, the higher results for the split samples from AXYS suggest that this speculation is correct.

#### Comparative Data on Wet Sediments

During the conference call on December 17, 2009, we asked if either laboratory had data comparing SDS to their respective procedure for wet sediments similar to the Lower Passaic River samples. AXYS stated that they had intercomparison study data on sediments and had data from standard reference materials (SRMs), but did not have comparative data between SDS and their procedure on naturally occurring wet sediments. When questioned further, AXYS noted that they have performed analyses of some SRMs to which they have added water, but that the intercomparison studies over the years have involved dry matrices. CAS indicated that they have data from dry SRMs, but also did not have comparative data on naturally occurring wet sediments.

#### Attempt to Correlate the Disparity with Percent Moisture

We believe that lack of use of baked, powdered sodium sulfate by CAS, and use of a relatively smaller amount of granular sodium sulfate compared to AXYS, prevented complete sample dehydration and, therefore, hindered extraction of the PCDDs/PCDFs. We attempted to correlate the magnitude of the disparity in results between the two laboratories with moisture content of the samples. Figure 1 shows a plot of the CAS-to-AXYS ratio for 2,3,7,8-TCDD as a function of percent moisture.

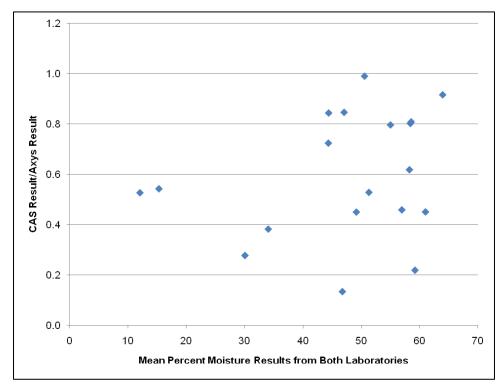


Figure 1. Ratio of CAS to AXYS 2,3,7,8-TCDD Results vs. Mean Percent Moisture

If moisture alone were affecting extraction of the PCDDs/PCDFs, we would expect that the CAS/AXYS ratio would decrease as percent moisture increased. However, the observed correlation was very weak (Spearman rank correlation = 0.21 for pairs for which both labs detected 2,3,7,8-TCDD above the laboratory-specific quantitation limit), and it was not statistically significantly different from 0 at the 95% confidence level. The reason for the lack of a strong correlation may be that the amount of sodium sulfate that CAS added varied between 5 and 10 grams, or that some portion of the sediment was more fully dehydrated in some samples than in others. We also plotted ratios for all 17 PCDDs/PCDFs on the same graph and arrived at the same conclusion as found for 2,3,7,8-TCDD; i.e., there is no correlation. Spearman rank correlations calculated between the percent moisture and CAS-to-AXYS ratio were not statistically significant at the 95% confidence level for any of the other PCDDs/PCDFs. We sought other variables that could be used to correlate the disparity in results, but found none.

#### Results from Analyses of 2005/2007 Newark Bay Split Sediment Samples

During the conference call on December 17, 2009, we learned that 47 split sediment samples from Newark Bay had been analyzed by AXYS and by Vista. AXYS used the same extraction procedure used for analyses of the Lower Passaic River sediment samples, whereas Vista used the SDS procedure in Method 1613B. The Newark Bay samples allowed a direct comparison of the AXYS procedure with SDS (as practiced by Vista) to ascertain if the procedures extracted the same amounts of material. Table 2 shows that, on average, the amount of 2,3,7,8-TCDD extracted by Vista with SDS was 13 percent less than the amount extracted by AXYS (the geometric mean of the Vista/Axys ratio is 0.87, or 87%)

The individual congener-specific geometric means ranged between 0.67 (1,2,3,7,8,9-HxCDD) and 3.61 (1,2,3,7,8,9-HxCDF), with a median geometric mean of 0.85. For 12 of the 17 congeners, the confidence interval did not include 1.0, indicating that the bias between laboratories for these congeners was statistically significant at the 95% confidence level. The widths of the confidence intervals are affected by the number of sample results available for the analyte, sometimes with striking effects (see 1,2,3,7,8,9-HxCDF for example).

Table 2. Geometric Means of 2005/2007 Newark Bay Vista/AXYS Ratios and Associated Confidence Intervals

		Vista/AXYS	Confidence	ce Intervals
PCDD/PCDF	n*	Geometric Mean	95% Lower Limit	95% Upper Limit
2,3,7,8-TCDD	47	0.87	0.77	0.98
2,3,7,8-TCDF	43	0.96	0.88	1.05
1,2,3,7,8-PeCDD	47	0.85	0.78	0.92
1,2,3,7,8-PeCDF	42	1.00	0.94	1.07
2,3,4,7,8-PeCDF	44	1.04	0.94	1.14
1,2,3,4,7,8-HxCDD	49	0.84	0.77	0.92
1,2,3,6,7,8-HxCDD	52	0.80	0.75	0.86
1,2,3,7,8,9-HxCDD	53	0.67	0.61	0.73
1,2,3,4,7,8-HxCDF	48	0.86	0.76	0.97
1,2,3,6,7,8-HxCDF	43	0.94	0.87	1.02
1,2,3,7,8,9-HxCDF	15	3.61	2.25	5.77
2,3,4,6,7,8-HxCDF	44	0.82	0.71	0.94
1,2,3,4,6,7,8-HPCDD	54	0.84	0.78	0.91
1,2,3,4,6,7,8-HPCDF	50	0.84	0.76	0.93
1,2,3,4,7,8,9-HPCDF	41	0.94	0.85	1.04
OCDD	54	0.78	0.71	0.86
OCDF	50	0.85	0.75	0.96
	dian	0.85	41 2 12	1

<sup>\*</sup>Includes only pairs for which both results exceeded their corresponding detection limit

A conclusion from the data for all 17 analytes is that SDS extracts, on average, approximately 15 percent less of the analytes than the AXYS procedure (the median ratio is 0.85 or 85%), although this conclusion has not been proven conclusively because different laboratories used the procedures at different times. The significant conclusion for the purpose of this examination is that the AXYS procedure and SDS (as practiced by Vista) both extract significantly more PCDDs/ PCDFs than the CAS procedure, indicating that the CAS results are biased low.

#### Results from Analyses of 2009 Lower Passaic River Split Sediment Samples

During the conference call on December 17, 2009, we also learned that split sediment samples from the Lower Passaic River had been analyzed in 2009 by AXYS and by AP. AXYS used the same extraction procedure used for analyses of the 2008 Lower Passaic River sediment samples, whereas AP used the SDS procedure in Method 1613B. The 2009 Lower Passaic River samples allowed a further direct comparison of AXYS procedure with SDS to ascertain if the procedures extracted the same amounts of material. Table 3 shows that, on average, the amount of 2,3,7,8-TCDD extracted by SDS (as practiced by AP) was 7% greater than the amount extracted by AXYS. However, the 7% difference is not statistically significant.

For these data, the individual congener-specific geometric means ranged between 0.69 (OCDF) and 1.37 (2,3,4,6,7,8-HxCDF), with a median geometric mean of 0.97. For 3 of the 17 congeners, the confidence interval did not include 1.0, indicating that the bias between laboratories for these congeners was statistically significant at the 95% confidence level. The widths of the confidence intervals in Table 3 tended to be wider than those in Table 2, largely as a consequence of the smaller number of split sample pairs.

The results in Table 3 lend further credence to the conclusion that the AXYS procedure extracts amounts of PCDDs/PCDFs similar to SDS, and that the AXYS procedure and SDS (as practiced by AP or Vista) both extract significantly more PCDDs/PCDFs than the CAS procedure, confirming that the CAS results are biased low.

Table 3. Geometric Means of 2009 Lower Passaic River AP/AXYS Ratios and Associated Confidence Intervals

		AP/AXYS	Confiden	ce Intervals
PCDD/PCDF	n*	Geometric Mean	95% Lower Limit	95% Upper Limit
2,3,7,8-TCDD	9	1.07	0.85	1.33
2,3,7,8-TCDF	10	1.09	1.00	1.19
1,2,3,7,8-PeCDD	9	0.95	0.84	1.08
1,2,3,7,8-PeCDF	9	1.05	0.85	1.31
2,3,4,7,8-PeCDF	10	1.83	1.69	1.98
1,2,3,4,7,8-HxCDD	10	0.92	0.84	1.01
1,2,3,6,7,8-HxCDD	10	0.95	0.87	1.04
1,2,3,7,8,9-HxCDD	10	0.77	0.72	0.83
1,2,3,4,7,8-HxCDF	10	0.97	0.77	1.22
1,2,3,6,7,8-HxCDF	10	0.95	0.66	1.37
1,2,3,7,8,9-HxCDF	2	1.28	0.01	127.42
2,3,4,6,7,8-HxCDF	10	1.37	1.21	1.54
1,2,3,4,6,7,8-HPCDD	10	1.20	1.10	1.30
1,2,3,4,6,7,8-HPCDF	10	0.96	0.72	1.27
1,2,3,4,7,8,9-HPCDF	10	0.81	0.44	1.49
OCDD	10	0.97	0.90	1.03
OCDF	10	0.69	0.50	0.94
Median		0.97		

<sup>\*</sup> Includes only pairs for which both results exceeded their corresponding detection limit

#### **Correction Factor**

The second task from Region 2 was to develop, if possible, a correction factor with uncertainty estimates.

Part of the data and information sent to CSC during October and November of 2009 included statistical analyses and graphs prepared by Malcolm Pirnie, Inc. (MPI) at the request of the U.S. Army Corps of Engineers and EPA. Based on line plots, bi-variate plots, and statistical analyses, MPI concluded that there was a systematic bias in results for 2,3,7,8-TCDD, with the results from CAS biased low by approximately a factor of two compared to results from AXYS. The statistical analyses and plots were helpful in understanding the significance of differences in results between CAS and AXYS.

Assumptions in Estimating a Correction Factor

Significant assumptions must be made in order to develop a correction factor. First, a correction factor cannot be estimated without error unless the true values of the PCDDs/PCDFs in the samples are known. However, as with any environmental samples, the true concentrations of PCDDs/PCDFs in the split samples are unknown. Therefore, if a correction factor must be developed, one must assume that the results from one of the two laboratories are closer to the true values.

While it could be argued that concentrations produced by CAS should be assumed to be true values, because neither lab used SDS (i.e., followed Method 1613B explicitly), the 2005/2007 Newark Bay data, and the 2009 Lower Passaic River data, combined with the fact that AXYS produced results that are usually greater than those produced by CAS, leads to a very firm conclusion that the AXYS results are closer to the true values. Otherwise, there would need to be a means by which AXYS was producing an excess of 2,3,7,8-TCDD and the other PCDDs/PCDFs, or there would need to be an inconsistent operation in the analysis, which we could not find.

Second, to prevent the correction factor(s) from being overly affected by a few high or low concentrations, we used the geometric mean of the sample-specific ratios between the CAS and AXYS results for a given congener as the best available means to adjust the CAS data to address the disparity.

We calculated the ratios of the CAS and AXYS results only for those split sample pairs for which both laboratories' results were greater than their corresponding quantitation limits, to assure that the ratios reflect the systematic differences between laboratories' results, rather than a comparison of quantitation limits. As a consequence, the number of ratios used in the geometric mean calculation differed among congeners. Table 4 provides the geometric mean of the CAS-AXYS ratio and the 95% lower and upper confidence limits for results above the quantitation limits for both labs.

Table 4. Geometric Means of 2008 Passaic River CAS/AXYS Ratios and Associated Confidence Intervals

		CAS/AXYS	Confiden	ce Intervals
PCDD/PCDF	n*	Geometric Mean	95% Lower Limit	95% Upper Limit
2,3,7,8-TCDD	19	0.53	0.41	0.69
2,3,7,8-TCDF	21	0.71	0.53	0.95
1,2,3,7,8-PeCDF	3	0.91	0.20	4.13
2,3,4,7,8-PeCDF	6	0.73	0.51	1.05
1,2,3,6,7,8-HxCDD	11	0.69	0.53	0.91
1,2,3,7,8,9-HxCDD	4	0.72	0.65	0.79
1,2,3,4,7,8-HxCDF	18	0.80	0.64	1.00
1,2,3,6,7,8-HxCDF	13	0.81	0.60	1.10
2,3,4,6,7,8-HxCDF	7	0.90	0.58	1.40
1,2,3,4,6,7,8-HPCDD	24	0.78	0.57	1.06
1,2,3,4,6,7,8-HPCDF	21	0.70	0.53	0.91
1,2,3,4,7,8,9-HPCDF	5	0.65	0.31	1.37
OCDD	28	0.71	0.52	0.97
OCDF	21	0.70	0.53	0.93
Me	dian	0.71		

<sup>\*</sup>Includes only pairs for which both results exceeded their corresponding quantitation limit

The individual congener-specific geometric means ranged between 0.53 (2,3,7,8-TCDD) and 0.91 (1,2,3,7,8-PeCDF), with a median geometric mean of 0.71. For seven of the fourteen congeners, the confidence interval did not include 1.0, thus indicating that the bias between laboratories was statistically significant at the 95% confidence level. Although fewer analytes exhibited statistically significant differences then in the 2005-2007 data, their geometric means in the 2008 data are further from 1.0, suggesting that the less frequent statistical significance observed in the 2008 data was a likely effect of the smaller number of paired results.

Table 4 does not include entries for the three congeners that were not consistently reported by both labs in these split samples. Specifically, 1,2,3,7,8-pentachlorodibenzo-*p*-dioxin (PeCDD), 1,2,3,4,7,8-hexachlorodibenzo-*p*-dioxin (HxCDD), and 1,2,3,7,8,9-hexachlorodibenzofuran (HxCDF) were not reported by both laboratories at levels above their respective quantitation limits in the same samples. We made no attempt to evaluate the results for these three congeners because comparing quantitation limits to one another, or comparing positive results and non-detects, would be misleading. However, it is worth noting that for these three congeners, CAS did not report a result above their QL for any samples, while AXYS reported a result above their QL for between 2-10 of the samples per congener.

Application of Correction Factors to the Remainder of CAS 2008 Data set

To be able to apply correction factors to samples other than the split samples in the 2008 CAS data set, certain additional assumptions must be made, above and beyond those made for development of the correction factors themselves. Because there are no split sample data for the vast majority of the 2008 CAS data set, there can be no assumption of true values, and no variability information for the assumed true values. That means that the assumptions for the split samples must be assumed to be true for the rest of the data set, further adjusted by the variability of the rest of the data.

We also considered the appropriateness of adjusting the CAS results using the geometric means. We believe that further information about the spatial distribution would be necessary before such an adjustment should be attempted, and that without split sample results, any such adjustment would be problematic. In particular, the confidence intervals in Table 2 are for the geometric mean itself. To be able to estimate the variability of a corrected (using the geometric mean) value would require estimating the covariance between the CAS and AXYS results, the covariance between the CAS result and the geometric mean, and the variability of an individual CAS result.

#### **Miscellaneous Issues**

Conference calls were held with EPA on December 9 and 17, 2009 to discuss CSC's preliminary findings. During the December 9 conference call, a recent paper was discussed, entitled *Formation of Polychlorinated Dibenzo-p-Dioxins during the Extraction of Pentachlorophenol-Contaminated Guar Gum* by Yves Tondeur, Bryan Vining, Allen Martin, Jeremy Morgan, and Jerry Hart presented at the 2009 Dioxin Symposium regarding the formation of certain PCDDs/PCDFs during extraction of samples with solvent systems containing acetone. Concern was expressed that the paper could be misinterpreted to state that the use of acetone by AXYS in the extraction could result in formation of certain PCDDs/PCDFs and could lead to inflated results by AXYS.

We reviewed the Tondeur et al. paper in greater depth after the call and believe that the differences between the situation it describes and the Lower Passaic River split samples are significant. First, the reaction requires precursors such as polychlorinated hydroxydiphenylethers, known impurities in pentachlorophenol (PCP) formulations. It is unlikely that these precursors are present in significant quantities in Lower Passaic River sediment, although we do not know for certain that these precursors are not present. Second, the reaction is catalyzed by an acid, such as the PCP that contaminated the guar gum. Unless the Lower Passaic River sediment was contaminated with an acid such as PCP, we would not expect an acid-catalyzed reaction of hydroxydiphenylethers with acetone to form PCDDs/PCDFs. Third, the major reaction products reported by Tondeur et al. are certain heptachlorodibenzo-p-dioxins (HpCDDs), pentachlorodibenzo-p-dioxins (PeCDDs), and octachlorodibenzo-p-dioxin (OCDD). 2,3,7,8-TCDD was not detected and is not mentioned in the paper. Fourth, the only congeners of environmental significance are those substituted in the 2, 3, 7, and 8 positions (see the list in Table 2). 1,2,3,7,8-PeCDD and OCDD were the only 2,3,7,8-substituted congeners found by Tondeur et al. Last, during the December 17 conference call, Yves Tondeur stated that he did not believe that 2,3,7,8-TCDD would form under the conditions presented in his paper. Given this information, we conclude that 2,3,7,8-TCDD would not be formed by use of acetone in the extraction, and that formation of other PCDDs/PCDFs of environmental significance is highly unlikely.

During the conference call on December 9, 2009, Louis Berger noted that TestAmerica-Knoxville (TAK) analyzed samples for PCB congeners for CPG, and that there were not systematic discrepancies between their results and the splits run for EPA. Following the call, CSC examined the sample chain-of-custody records provided by EPA and determined that AXYS also analyzed these same samples for PCBs. We contacted TAK and learned that TAK uses hexane:acetone (1:1) with no sodium sulfate for extraction of PCBs from soil and sediment (we did not mention the Lower Passaic River project). Because the PCB results from AXYS and TAK were comparable, it would appear that use of acetone as a co-solvent in the extraction may obviate the need for sodium sulfate. Co-solvents using acetone would need to be investigated further if an alternative to baked, powdered, anhydrous sodium sulfate was desired. However, given that baked, powdered, anhydrous sodium sulfate is known to work, and is specified in many environmental analytical methods, including Method 1613B, further effort in this area is, in our opinion, unwarranted.

<sup>&</sup>lt;sup>1</sup> CSC also learned that TAK uses SDS for extraction of PCDDs/PCDFs from soil and sediment as per Method 1613B for solid matrices, and uses baked, powdered, anhydrous sodium sulfate and Soxhlet extraction per Method 1613B for tissue.

During the conference call on December 17, 2009, a discussion was held regarding a potential plan for reanalysis of the split Lower Passaic River sediment samples archived at AXYS. The samples would be analyzed by SDS to establish concentrations determined by Method 1613B as written. These concentrations would then be assumed to be "correct values" and could be compared to concentrations determined by AXYS and CAS to further learn which concentrations are closest to concentrations determined by Method 1613B. However, in light of the 2005, 2007, and 2009 results that demonstrate that AXYS procedure produces either slightly higher results (13% difference in the 2005/2007 data) or not significantly different results (7% difference in the 2009 data), further analyses of these samples is unwarranted.

#### **Findings and Recommendations**

From the information provided, our finding is that one or more modifications of EPA Method 1613B by CAS and AXYS are responsible for the disparities in results between the two laboratories. These modifications are:

- Use of J.T. Baker sodium sulfate by AXYS vs. use of EMD Chemicals sodium sulfate by CAS,
- Use of 75 100 g of anhydrous sodium sulfate by AXYS vs. 5 10 g by CAS,
- Baking of the sodium sulfate at 325 °C for 8 hours by AXYS, but no baking by CAS,
- Allowing 30 min drying time of the sample/sodium sulfate mixture after addition of sodium sulfate by AXYS, but not by CAS, and/or
- Use of toluene:acetone (80:20) as the extraction solvent by AXYS vs. use of toluene only by CAS.

We believe that the amount of sodium sulfate and the toluene:acetone co-solvent are likely the most significant factors. Specifically, we believe that the use of larger amounts of sodium sulfate by AXYS and use of a toluene:acetone co-solvent resulted in a more complete extraction of PCDDs/PCDFs from the sediment.

Another finding is that, based on the Tondeur *et al.* paper and statements made by Yves Tondeur, there is no evidence that acetone used as an extraction solvent results in formation of PCDDs/PCDFs. Therefore, results by AXYS are not inflated over the true values in the sediment.

Finally, results from the 2005/2007 and 2009 split samples provide ample evidence that AXYS produces results that are sufficiently close to the results produced by SDS that EPA can proceed with application of a correction factor to the 2008 CAS data.

Application of a Correction Factor to the CAS 2008 Lower Passaic River Data

Based on the information in this examination, application of a correction factor to the 2008 data set is appropriate. However, for a correction factor to be applied to these data, we suggest an examination of the spatial distribution of the samples collected for the splits and for the remainder of the 2008 data, and an examination of the error structure of the CAS measurements, to attempt to learn how the error associated with any correction would be affected.

# The Effect of Application of a Correction Factor on Chlorinated Dibenzo-p-Dioxins and Dibenzofuran Results Produced by Columbia Analytical Services for Lower Passaic River Sediment Samples

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# The Effect of Application of a Correction Factor on Chlorinated Dibenzo-p-Dioxins and Dibenzofuran Results Produced by Columbia Analytical Services for Lower Passaic River Sediment Samples

#### I. Introduction

In October of 2009, Alice Yeh, EPA Region 2, contacted the Office of Water, Engineering and Analysis Division (EAD), Engineering and Analytical Support Branch (EASB) for assistance in finding the reason(s) for disparities in the results between Columbia Analytical Services (CAS) and AXYS Analytical Services (AXYS) for determination of 2,3,7,8-substituted polychlorinated dibenzo-*p*-dioxins and polychlorinated dibenzofurans (PCDDs/PCDFs) in split sediment samples from studies in the Lower Passaic River in 2008. CAS analyzed the split samples between August 2008 and April 2009 for the Cooperating Parties Group (CPG), representing potentially responsible parties (PRPs). AXYS analyzed the split samples between October 2008 and January 2009 for EPA.

Region 2 requested that EASB help with the following two tasks:

- Attempt to determine a reason or reasons for the systematic bias in the data, and
- If possible and appropriate, provide a correction factor that would allow the full 2008 CAS data set for PCDDs/PCDFs to be adjusted for the disparity.

EPA, along with its contractor, Computer Sciences Corporation (CSC) and their subcontractor, Interface, Inc., performed an assessment of the split data and any supporting documentation and information to complete the above tasks.

From this analysis, it was concluded that both CAS and AXYS made one or more deviations from EPA Method 1613B. These deviations are responsible for the disparities in results between the two laboratories. The ultimate effect of these deviations was a more complete extraction of PCDDs/PCDFs from the sediment by AXYS, compared to CAS.

A potential correction factor was calculated for each PCDD/PCDF by calculating the geometric mean of the individual sample split ratios for all pairs for which both labs yielded results exceeding their QL. By multiplying the PCDD/PCDF CAS results from non-split samples by this factor, the magnitude of the systematic bias in these results would be reduced. However, it was cautioned that the effect of application of a correction factor on the precision of the CAS results, and an examination of how the spatial distribution of the samples collected for the splits may differ from the spatial distribution of the non-split 2008 samples, be performed prior to adjusting any of the data.

In May of 2010, Alice Yeh requested that EASB and CSC complete these suggested assessments. CSC requested documentation on the initial sampling design of the 2008 sample collection, and of the sample splitting, and received this information in August 2010.

The remainder of this report describes CSC's examination of the difference in random variability (i.e., precision) of the corrected CAS PCDD/PCDF results compared to the uncorrected results, and whether the sample splits are representative of the full set of 2008 PCDD/PCDF data.

#### II. Effect of Correction Factor Application on Random Variability

It has been previously shown that PCDD/PCDF results determined from split samples by CAS as part of the 2008 Lower Passaic River sampling are biased low when compared to those determined by AXYS, based on deviations from method requirements (CSC and Interface, 2010). To minimize the effect of this low bias on the remaining PCDD/PCDF 2008 sample results, it was suggested that a correction factor be

applied. A correction factor for each PCDD/PCDF was calculated as the geometric mean of the ratios between the two labs' results for all sample splits for which both laboratories detected the target analyte above their QL. However, CSC previously advised EPA to be cautious when applying this correction factor, as it is likely that the corrected results, while having less systematic variability, will have larger random variation.

The calculations used to estimate the variability associated with a corrected result are detailed in Appendix 1. These calculations require estimates of the variability and the mean of the correction factors. These estimates were developed in two ways: 1) direct estimation based on the assumption that individual split sample results from across the site are log-normally distributed, and 2) determining robust estimates using Bootstrap estimation. These two methodologies are described in detail in Appendix 2.

Once estimates of the variability associated with corrected results were made, they were compared to the variability of a single uncorrected sample result. Because the variability of the individual CAS results was largely driven by spatial variability (i.e., inherent differences in PCDD/PCDF concentrations across the site), the analytical portion of this total variability was estimated using the 42 field duplicate samples collected at the site. While variability estimates determined using these field duplicate samples would include sampling variability in addition to analytical variability, these data would still yield the most accurate estimate of the variability associated with a single measured result.

Once the variances of an uncorrected and corrected result are estimated, the relative increase in variability occurring for a corrected result can be determined by calculating the ratio of these two estimates. These ratios quantify the increase in variability of a single sample result that would occur if that result was to be adjusted using the correction factor. These ratios were determined by comparing both the variances and standard deviations of corrected and uncorrected results. The results of this assessment, with correction factor variability estimates based on the lognormal assumption and Bootstrap estimation, are shown in Tables 1 and 2, respectively. Additionally, each table shows the correction factor calculated from the sample splits, and the number of duplicate pair results and sample split results used in the calculation. Table 1 also presents the correlation calculated between the log-transformed results of the sample splits for each PCDD/PCDF (used in the lognormal distribution estimation of the correction factor variability, but not in the Bootstrap estimation).

Table 1. Ratios of Standard Deviations and Variances of Corrected to Uncorrected Results, Based on Lognormal Distribution Estimation

		# Duplicate	Correction	Correlation between Split	Estimated Increase in Variability of a Corrected Result			
PCDD/PCDF	# Splits	Pairs	Factor	Results	Std. Dev.	Variance		
1,2,3,4,6,7,8-HpCDD	24	32	1.282	0.885	1.504	2.261		
1,2,3,4,6,7,8-HpCDF	21	31	1.429	0.886	1.501	2.253		
1,2,3,4,7,8,9-HpCDF	5	8	1.538	0.503	3.279	10.751		
1,2,3,4,7,8-HxCDF	18	24	1.250	0.920	1.301	1.693		
1,2,3,6,7,8-HxCDD	11	12	1.449	0.826	1.653	2.732		
1,2,3,6,7,8-HxCDF	13	15	1.235	0.556	1.369	1.874		
1,2,3,7,8,9-HxCDD	4	7	1.389	0.997	1.416	2.004		
1,2,3,7,8-PeCDF	3	4	1.099	0.937	2.044	4.179		
2,3,4,6,7,8-HxCDF	7	10	1.111	0.693	1.324	1.754		
2,3,4,7,8-PeCDF	6	8	1.370	0.951	1.991	3.966		
2,3,7,8-TCDD	19	33	1.887	0.952	2.126	4.519		
2,3,7,8-TCDF	21	30	1.408	0.789	1.561	2.437		
OCDD	28	40	1.408	0.872	1.645	2.705		
OCDF	21	31	1.429	0.848	1.487	2.213		

As can be seen from Table 1, the ratio of the corrected to uncorrected standard deviations tended to be slightly higher than the correction factor for most of the dioxins/furans. This indicates that the variability of a corrected result would be slightly greater than that of an uncorrected result of the same value. For example, if CAS determined a 2,3,7,8-TCDD result of 100 ng/kg, which was adjusted to 188.7 ng/kg using the correction factor, the variability of this corrected result would be slightly larger than that of an uncorrected CAS result of 188.7 ng/kg (i.e., from another sample).

For a few dioxins and furans, the ratio of corrected to uncorrected standard deviations exceeded the correction factor. This tended to occur for analytes for which very few sample splits and/or field duplicate pairs yielded results above the QL, and/or analytes that did not have strong correlations between the two labs' log-transformed results. For example, while the correction factor for 1,2,3,4,7,8,9-HpCDF is 1.538, the standard deviation of a corrected result would be 3.3 times greater than that of an uncorrected result. This was due to both the small number of sample splits (5) and duplicate pairs (8) used in the correction factor calculation, and the relatively weak correlation (r=0.503) observed between the two labs' results for those splits.

Table 2. Ratios of Standard Deviations and Variances of Corrected to Uncorrected Results, Based on Bootstrap Estimation

	#	#		Estimated Increase in Variabilit a Corrected Result		
PCDD/PCDF	Splits	<b>Duplicate Pairs</b>	<b>Correction Factor</b>	Std. Dev.	Variance	
1,2,3,4,6,7,8-HpCDD	24	32	1.282	1.404	1.971	
1,2,3,4,6,7,8-HpCDF	21	31	1.429	1.457	2.122	
1,2,3,4,7,8,9-HpCDF	5	8	1.538	1.665	2.772	
1,2,3,4,7,8-HxCDF	18	24	1.250	1.282	1.642	
1,2,3,6,7,8-HxCDD	11	12	1.449	1.486	2.208	
1,2,3,6,7,8-HxCDF	13	15	1.235	1.248	1.559	
1,2,3,7,8,9-HxCDD	4	7	1.389	1.400	1.959	
1,2,3,7,8-PeCDF	3	4	1.099	1.100	1.210	
2,3,4,6,7,8-HxCDF	7	10	1.111	1.134	1.285	
2,3,4,7,8-PeCDF	6	8	1.370	1.435	2.059	
2,3,7,8-TCDD	19	33	1.887	1.942	3.771	
2,3,7,8-TCDF	21	30	1.408	1.475	2.176	
OCDD	28	40	1.408	1.592	2.533	
OCDF	21	31	1.429	1.417	2.007	

The estimated ratios calculated using the Bootstrap estimation technique were slightly smaller than those determined following the lognormal distribution assumption. For those PCDD/PCDFs with very little data above the QL, the bootstrap-estimated standard deviation ratios were lower than those shown in Table 1.

#### **III. Representativeness of Correction Factor**

As stated in the QAPP for CPG Oversight of Lower Passaic River Restoration Project (LPRRP) 2008 Sediment Coring:

"Under the planned oversight program a total of 30 split sediment samples will be collected judgmentally by on-site oversight personnel from the sediment samples being collected and homogenized by the CPG. The selection of split samples by the oversight personnel will consider factors such the type of sediment and the depth of the segments, as well as the availability of sufficient sample material. A preference will be given to obtaining samples which appear to be potentially contaminated based upon their appearance (color), odor and texture."

Therefore, the sampling locations and samples that were to be split were not randomly selected. As a result, it cannot be assumed that these samples, and the correction factor calculated based on results determined from these samples, are representative of the site as a whole. The statement that preference would be given to samples which appeared to be contaminated implies that on average, sample split results could be higher than those of non-split samples.

Table 3 shows the frequency of non-split and split samples for each of the site areas, as defined in the QAPP for RI Low/Resolution Coring/Sediment Sampling in the LPRRP RI/FS.

Table 3. Frequency of Split and Non-Split Samples by Study Area

	Non-S	Splits	Splits			
Study Area	Number of Samples	Percent of Samples	Number of Samples	Percent of Samples		
Point-no-Point Reach	208	30.9	12	40.0		
Harrison Reach	72	10.7	1	3.3		
Newark Reach	59	8.8	0	0.0		
Kearny Reach	29	4.3	1	3.3		
Upstream	41	6.1	6	20.0		
Second River	85	12.6	4	13.3		
Third River	109	16.2	4	13.3		
Saddle River	5	0.7	0	0.0		
Above Dundee Dam	35	5.2	2	6.7		
Tributaries	30	4.5	0	0.0		
Total	673	100	30	100		

As can be seen, the frequency of samples being split was generally close across the site, though there was a slightly higher frequency of split samples (i.e., the percent of splits collected in the area exceeded the percent of non-splits that were collected at that area) in the Upstream area, and a lower frequency of split samples (i.e., the percent of splits collected in the area was less than the percent of non-splits that were collected at that area) across the Harrison, Newark and Kearny reaches. These three areas tended to have higher PCDD/PCDF concentrations than other areas of the site.

While the sampling frequency seemed to indicate that the sample split data are not fully representative of the data as a whole, systematic differences in the analytical results were not observed for most dioxins and furans. Table 4 shows the descriptive statistics of all PCDD/PCDF results above the QL for the split and non-split samples. Results of two-sample t-tests comparing the mean log-transformed concentrations of the split and non-split samples, and of F-tests comparing the variance of the log-transformed concentrations of the split and non-split samples also are presented. Both tests were run at the 95% confidence level.

Among the 14 PCDD/PCDFs with results that exceeded the QL, the mean of the split sample results differed significantly from the mean of the non-split sample results for only two furans (2,3,4,6,7,8-HxCDF and 2,3,7,8-TCDF). For 2,3,4,6,7,8-HxCDF, the mean log-transformed concentration was significantly higher for the non-split samples, while for the 2,3,7,8-TCDF, the mean log-transformed concentration was significantly higher for the split samples. The variance of the log-transformed split sample results differed significantly from the variance of the log-transformed non-split results for four furans; in all cases but one (2,3,4,7,8-PeCDF), the variability was higher for the non-split samples.

Figures 1 and 2 show the distribution of 2,3,7,8-TCDD and 2,3,7,8-TCDF for the split and non-split samples, respectively.

Table 4. Comparison of PCDD/PCDF Results for Split and Non-split Samples

		Non-	Split Sample	es 1	-	Split Samples <sup>1</sup>						
	#	%				#	%					
PCDD/PCDF	Results > QL	Results > QL <sup>2</sup>	Mean (ng/kg)	Median (ng/kg)	SD (ng/kg)	Results > QL	Results > QL <sup>3</sup>	Mean (ng/kg)	Median (ng/kg)	SD (ng/kg)	Difference in means? 4	Difference in Variance? 5
1,2,3,4,6,7,8-HpCDD	534	79.35%	490.07	321.50	576.04	24	80.00%	576.83	499.50	589.83	N (p=0.748)	N (p=0.366)
1,2,3,4,6,7,8-HpCDF	492	73.11%	717.16	373.00	1285.42	21	70.00%	692.59	610.00	640.51	N (p=0.390)	N (p=0.527)
1,2,3,4,7,8,9-HpCDF	82	12.18%	61.74	43.85	51.25	5	16.67%	45.28	46.20	8.45	N (p=0.320)	Y (p=0.038)
1,2,3,4,7,8-HxCDF	362	53.79%	233.68	140.50	360.69	18	60.00%	188.34	168.50	144.83	N (p=0.919)	N (p=0.790)
1,2,3,6,7,8-HxCDD	181	26.89%	78.10	57.10	72.96	11	36.67%	80.02	57.30	64.50	N (p=0.774)	N (p=0.985)
1,2,3,6,7,8-HxCDF	209	31.05%	85.64	60.10	90.14	13	43.33%	63.09	62.20	22.62	N (p=0.428)	Y (p=0.027)
1,2,3,7,8,9-HxCDD	91	13.52%	53.93	41.90	56.46	4	13.33%	57.53	39.50	47.15	N (p=0.908)	N (p=0.250)
1,2,3,7,8-PeCDF	59	8.77%	65.82	40.00	76.83	3	10.00%	38.87	43.30	10.76	N (p=0.565)	N (p=0.348)
2,3,4,6,7,8-HxCDF	137	20.36%	66.92	49.40	49.70	7	23.33%	41.30	37.40	10.73	Y (p=0.017)	Y (p=0.040)
2,3,4,7,8-PeCDF	147	21.84%	69.28	53.90	50.07	6	20.00%	199.50	68.30	278.18	N (p=0.224)	Y (p=0.005)
2,3,7,8-TCDD	491	72.96%	1718.97	155.00	7978.42	19	63.33%	461.25	223.00	711.27	N (p=0.748)	N (p=0.214)
2,3,7,8-TCDF	506	75.19%	33.78	16.80	50.41	21	70.00%	56.30	23.90	88.90	Y (p=0.025)	N (p=0.582)
OCDD	634	94.21%	4853.84	2580.00	7148.75	28	93.33%	5151.00	2405.00	5380.48	N (p=0.600)	N (p=0.879)
OCDF	487	72.36%	1557.90	741.00	3864.91	22	73.33%	1238.81	900.00	1261.26	N (p=0.730)	N (p=0.695)

Descriptive statistics calculated using results above QL only.

Compared to 673 total non-split samples.

Compared to 30 total split samples.

Based on two-sample t-tests performed based on log-transformed results ( $\alpha$ =0.05). Satterthwaite degree of freedom correction applied if variances differed significantly. Significant differences indicated with bold font.

Based on F-test performed based on log-transformed results ( $\alpha$ =0.05). Significant differences indicated with bolt font.

Generally, there seems to be little systematic difference in mean concentration between the dioxin and furan results determined from split samples and those determined from non-split samples. For example, the median of the log-transformed 2,3,7,8-TCDD concentrations (approximately equal to the mean log-transformed concentrations, due to the symmetric distribution) for the split and non-split samples were very close, as shown by the red horizontal lines in Figure 1A. Significant differences in mean concentration between split and non-split samples only were observed for two furans, including 2,3,7,8-TCDF as can be seen in Figure 1B, The larger frequency of significant differences in variability between the split and non-split samples is not surprising. Only 30 of the 673 samples collected were splits, and the much larger number of non-split samples would be expected to yield greater variability because more sources of variance would be included in those samples than in the splits. This variability difference could indicate that the correction factor determined from split samples may not be representative of samples with results at the upper or lower end of the distribution (though results below the QL would not necessarily be corrected).



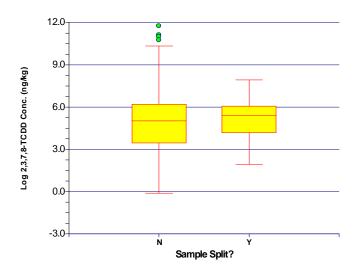
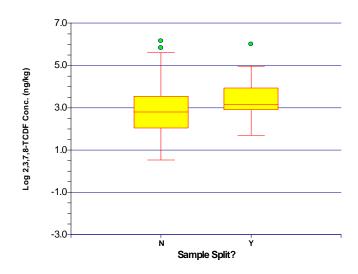


Figure 2. Distribution of 2,3,7,8-TCDF for Split and Non-split Samples



While the results of the comparisons described above varied between analytes, it is worth noting that the question of representativeness is ultimately one of sample design, and therefore would be true of all analytes or of no analytes. Additionally, performing separate comparisons for the relatively large number of dioxins and furans would increase the probability of at least one analyte yielding a false positive conclusion, i.e., that a significant difference exists between the split and non-split samples when in fact there is none. To protect against this inflated probability, the mean and variance comparisons presented in Table 4 were performed again, using the Bonferroni adjustment, which adjusts the significance level of individual comparisons such that the overall probability of concluding that any analytes within an analyte group differed significantly between split and non-split samples was 5%. For the purpose of this analysis, the first analyte group was defined to be dioxins (i.e., the 5 analytes with results exceeding the QL for both split and non-split samples), and the second group was defined to be furans (i.e., the 9 analytes with results exceeding the QL for both split and non-split samples). The analytes that did not exceed the QL were not evaluated in this assessment. When the Bonferroni adjustment was used, the mean concentrations of split and non-split samples did not differ significantly for any analyte within the two groups, and the variances of split and non-split samples differed significantly for only one furan (2,3,4,7,8-PeCDF).

Whether the comparison results with the Bonferroni adjustment are more valid than the unadjusted comparison results depends on how the decision regarding the correction factor would be made. If EPA decides that the correction factor will be applied to some analytes and not others, than the unadjusted analyses would be more appropriate. If EPA decides that the correction factor will be applied to either all analytes or no analytes, than the adjusted analysis results would be preferable. However, given the relatively infrequent occurrence of significant differences, and the tendency for significant differences to occur for analytes with fewer detects above the QL (for example, the four furans for which the variability differed significantly between split and non-split samples were not detected above the QL for the majority of samples), it is unlikely that the Bonferroni adjustment would have a strong effect on the ultimate decision.

#### **IV. Conclusions**

The systematic difference between PCDD/PCDF concentrations determined by CAS and those determined by AXYS indicates that a systematic correction of results determined by CAS may be warranted. Using the geometric mean of the ratios calculated across split samples as a correction factor would decrease the bias of the CAS-determined results for non-split samples. However, applying this factor could have a detrimental effect on the usability of the data if the corrected results have much larger variances associated with them than the uncorrected variances, or if the correction factors are based on a subset of samples that are not representative of the dataset as a whole.

An assessment of the variability of the correction factors and the uncorrected results indicates that while the variability associated with a corrected result is larger than that of an uncorrected result, that increase would only be slight compared to an uncorrected result without the low bias. The only exceptions to this are for PCDD/PCDFs for which the correction factors were based on a small number of splits, due to the low frequency of detection above the QL. Therefore it does not appear that application of the correction factor will seriously decrease the precision of the data for most PCDD/PCDFs.

The choice of samples to be split and sent to the additional laboratory was made on a systematic, rather than random, basis. One of the factors in this selection was to prioritize samples that appeared to be contaminated based on visual inspection. This could potentially yield correction factors that were calculated from samples with higher concentrations than those samples to which the factor would be applied. However, there was little evidence of this in the data. In general, the frequency of samples

chosen for splitting across the various areas of the site did not seem to differ notably from the overall sampling frequency. Additionally, a statistically significant difference in the mean concentration was not observed between split and non-split samples for most PCDD/PCDFs. Differences in variability were observed for some of the furans, which may indicate that the split data and the resulting correction factors may not be representative of results on the upper and lower ends of the distribution. However, the large number of analytes can inflate the probability of falsely concluding that a difference between split and non-split samples exists. If the Bonferroni adjustment is used to hold the probability of falsely concluding a difference occurs for any analytes within a group (i.e., dioxins or furans) to 5%, a difference in variability is only observed for one furan. However, the significant differences in variability that were observed when the adjustment was not made tended to occur for analytes with infrequent detects. As a result, the Bonferroni adjustment should not have a strong effect on the ultimate decision of whether to apply the correction factor to the data.

As a whole, the issues surrounding application of the correction factor appear to be outweighed by the decrease in bias achieved by applying this factor. This is especially true for 2,3,7,8-TCDD, the analyte with the largest systematic difference observed in the split samples. Based on this assessment, the observations regarding method deviations described in CSC's previously submitted review, and the relative consistency of the biases observed across the various dioxins and furans, it is recommended that the correction factors be applied to the 2008 CAS PCDD/PCDF data.

If the correction factors are to be applied, the following are recommended:

- The correction factor should not be applied to results below the CAS QL, because laboratory differences for these results would be due to a sensitivity difference rather than a relative bias. This would also limit the effect of any representativeness issues regarding the correction factor, as differences between the split and non-split samples tended to occur for analytes with few detects.
- Rather than applying the correction factor to the CAS results for the sample splits, the original AXYS results from these samples should be used to avoid the variability increase occurring due to the correction factor application.

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## Appendix 1: Estimating the Variance of a Corrected Value using the Delta Method Approximation

Let C<sub>i</sub> be a PCDD/PCDF result from CAS, and let CF be the correction factor that will be used to adjust that result.

The approach to estimating the variability of a corrected estimate would depend on whether the correction factor is correlated with the individual CAS sample results. Generally, the larger this correlation is, the greater the estimated variability of the corrected values. However, the ratio of AXYS to CAS results did not tend to increase with increasing CAS concentration (i.e., the ratio itself did not vary systematically with CAS concentration), and in some cases decreased slightly with increasing CAS concentration. For example, Figure 3 is a scatterplot of the 2,3,7,8-TCDD CAS results vs. the calculated AXYS/CAS ratio for that pair.

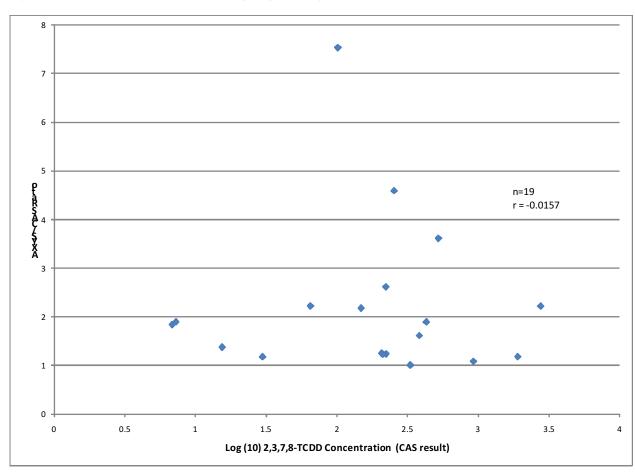


Figure 3. 2,3,7,8-TCDD CAS result for Sample Splits Compared to AXYS/ CAS Ratio

Because of this lack of an association, the covariance between the correction factor and a sample result could conservatively be set to 0. Therefore, the variance of a corrected result can be estimated directly (Stuart and Ord, 2009), using the formula below:

$$Var(Z) = Var(X)(E[Y])^{2} + Var(Y)(E[X])^{2} + Var(X)Var(Y)$$

Replacing the general terms X and Y with C, the function of PCDD/PCDF results from CAS, and CF, the correction factor calculated as the geometric mean of ratios of sample splits:

$$Var(Z) = Var(C)(E[CF])^{2} + Var(CF)(E[C])^{2} + Var(CF)Var(C)$$

The mean of the CAS results can be estimated directly from the sample splits for each dioxin and furan. Because the variance over the CAS results will be driven largely by the inherent spatial variability of PCDD/PCDF concentration across the site, the variance of a single CAS result was estimated using the field duplicate pairs collected at the site and analyzed by CAS. The variance component attributable to duplicate variability (i.e., excluding all spatial and temporal variability) was estimated using variance component analysis based on Restricted Maximum Likelihood estimation (Hemmerle and Hartley, 1973), and was adjusted to estimate the variability of an individual result based on the formula below:

$$Var(C) = \left(1 + \frac{1}{n_{dup}}\right) s_{dup}^2$$

Where  $s^2_{dup}$  is the variance component attributable to duplicate variability, and

 $n_{dup}$  is the number of duplicate pairs exceeding the ML for the given PCDD/PCDF.

The expected value and variance of the correction factors can be estimated following the derived formulas shown in Appendix 2.

The relative increase in variability that the correction factor application would yield can be estimated using the ratio of the corrected to the uncorrected result:

$$Ratio = \frac{Var(Z)}{Var(C)}$$

The relative increase in standard deviation equals the square root of the above ratio.

## Appendix 2: Estimating the Mean and Variance of the Correction Factor Determined from Sample Splits

#### Approach 1 – Properties of the Lognormal Distribution

The correction factor for each PCDD/PCDF is calculated using the formula:

$$CF = \prod_{i=1}^{n} \left(\frac{A_i}{C_i}\right)^{1/n}$$

where A<sub>i</sub> and C<sub>i</sub> are the AXYS and CAS results, respectively, for sample split i.

Using the properties of logarithms, this can be restated as:

$$CF = \exp\left[\frac{1}{n}\sum_{i=1}^{n}\log(\frac{Ai}{Ci})\right]$$

$$= \exp[\frac{1}{n} [\sum_{i=1}^{n} \log(Ai) - \log(Ci)]]$$

$$= \exp[\left[\frac{1}{n}\sum_{i=1}^{n}\log(Ai)\right] - \left[\frac{1}{n}\sum_{i=1}^{n}\log(Ci)\right]]$$

If we let  $LA_i = LN(A_i)$  and  $LC_i = LN(C_i)$ , and  $\overline{LA}$  and  $\overline{LC}$  are the calculated sample means of the log-transformed AXYS and CAS results, respectively, then the equation for CF becomes:

$$CF = \exp[\overline{LA} - \overline{LC}]$$

If the individual dioxin and furan results obtained by the two laboratories are each lognormally distributed (i.e., if the LA are normally distributed with mean  $\mu_1$  and variance  $\sigma_1^2$  and the LC are normally distributed with mean  $\mu_2$  and variance  $\sigma_2^2$ ), then

$$\overline{L}\overline{A} \sim N(\mu_1, \sigma_1^2/n)$$

$$\overline{LC} \sim N(\mu_2, \sigma_2^2/n)$$

The above equations assume that the individual  $A_i$  and  $C_i$  results are independent of each other (i.e., the individual split sample results determined by AXYS are all independent of each other, and the individual split sample results determined by CAS are all independent of each other). Most of the split sampling locations were widely distant from other split sample locations. However, independence may not be true for all of the samples because, in a few cases, the samples represent different depths at the same location, or at proximal (nearby) locations. Despite the few exceptions, any covariance among the split results within either laboratory should be small, and therefore any impact of the assumption of independence would be small.

Therefore.

$$\overline{LA} - \overline{LC} \sim N(\mu_1 - \mu_2, \sigma_1^2/n + \sigma_2^2/n - 2\rho \sigma_1 \sigma_2/n)$$
, where  $\rho$  is the correlation between  $\overline{LA}$  and  $\overline{LC}$ .

Therefore,

$$\begin{split} E[CF] = & \exp[(\mu_1 - \mu_2) + 0.5*(\ \sigma_1^{\ 2}/n + \ \sigma_2^{\ 2}/n - 2\rho\ \sigma_1\ \sigma_2/n)] \\ Var[CF] = & \exp[2*[(\mu_1 - \mu_2) + (\sigma_1^{\ 2}/n + \ \sigma_2^{\ 2}/n - 2\rho\ \sigma_1\ \sigma_2/n)]] - \exp[[2*(\mu_1 - \mu_2)] + (\sigma_1^{\ 2}/n + \ \sigma_2^{\ 2}/n - 2\rho\ \sigma_1\ \sigma_2/n)] \end{split}$$

#### Approach 2 – Bootstrap Estimation Technique

While the distribution of most PCDD/PCDFs tended to be approximately lognormal, the correction factor mean and standard deviation can be estimated using a resampling technique that does not make this distributional assumption. The specific technique used in this analysis is the Bootstrap estimation technique (Davison and Hinckley, 1997).

The Bootstrap estimates were determined by simulating 1,000 sets geometric means for each PCDD/PCDF. For each set, 30 split pair results were selected with replacement from the set of split results that exceeded the QL for that analyte. The mean of the correction factors, E[CF], was calculated as the mean of the 1,000 simulated geometric means. The correction factor variance, Var[CF], was calculated as the variance of the 1,000 simulated geometric means.